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NO. DC-19-09828

D&T PARTNERS, LLC) IN THE DISTRICT COURT OF
(successor in interest)
to ACET Venture)
Partners, LLC),)
)
Plaintiff)
)
VS.) DALLAS COUNTY, T E X A S
)
ACET GLOBAL, LLC;)
BAYMARK ACET HOLDCO,)
LLC; BAYMARK ACET)
DIRECT INVEST, LLC;)
BAYMARK MANAGEMENT,)
LLC; BAYMARK PARTNERS;)
DAVID HOOK; TONY)
LUDLOW; AND WINDSPEED)
TRADING, LLC,)
)
Defendants.) 116TH JUDICIAL DISTRICT

ZOOM VIDEOCONFERENCE DEPOSITION OF SAI VATTANA
Monday, April 5, 2021
2:32 p.m. - 5:28 p.m.
Location of the witness: Fresno, California
Volume 1 of 1 - Pages 1 - 115
(REPORTED REMOTELY)

Stenographic Reporter:

DENYCE M. SANDERS, TX CSR, RDR, CRR, CCR (LA)
dsanderscsr@gmail.com

1 REMOTE APPEARANCES 2 3 ON BEHALF OF PLAINTIFF: 4 FREEMAN LAW, PLLC 5 BY: Mr. Jason B. Freeman 6 jason@freemanlaw.com 7 7011 Main Street 8 Frisco, Texas 75034 9 214.984.3410 10 *** 11 ON BEHALF OF BAYMARK ACET HOLDCO, LLC; BAYMARK ACET 12 DIRECT INVEST, LLC; BAYMARK MANAGEMENT, LLC; BAYMARK 13 PARTNERS; DAVID HOOK; TONY LUDLOW: 14 HALLETT & PERRIN, P.C. 15 BY: Mr. Edward P. Perrin, Jr. 16 eperrin@hallettperrin.com 17 1445 Ross Avenue, Suite 2400 18 Dallas, Texas 75202 19 214.953.0053 20 *** 21 ON BEHALF OF WINDSPEED TRADING, LLC: 22 HIGIER ALLEN & LAUTIN 23 BY: Ms. Brenda A. Hard-Wilson 24 bhard-wilson@higierallen.com 25 The Tower at Cityplace 26 2711 N. Haskell Avenue, Suite 2400 27 Dallas, Texas 75204 28 972.716.1888 29 ALSO PRESENT: 30 Tomer Damti	Page 2 1 EXHIBIT INDEX 2 ORAL DEPOSITION OF 3 SAI VATTANA, APRIL 5, 2021 4 Description Page 5 ** Introduced Exhibits ONLY 6 Exhibit 2 Zulily Purchase Order 2.6.19.. 77 7 Exhibit 3 DHL invoice 12.9.18..... 80 8 Exhibit 4 DHL eCommerce 2.19.19..... 81 9 Exhibit 9 DHL Driver's Manifest 83 10 Shipment Summary 2.4.19 11 Exhibit 10 RDC-Merchant Promotion 84 12 Agreement 13 Exhibit 12 Notice of Disposition..... 87 14 Exhibit 14 Koolulu logo..... 94 15 Exhibit 15 Windspeed website 12.12.18.... 94 16 Exhibit 16 Windspeed jewelry page..... 95 17 Exhibit 17 Acet Global jewelry page..... 97 18 Exhibit 18 Vattana LinkedIn..... 23 19 Exhibit 19 Groupon email chain..... 58 20 Exhibit 26 Jane Lin termination email ... 106 21 10.9.18 22 • _____ • 23 24 25
1 INDEX 2 ORAL DEPOSITION OF 3 SAI VATTANA, APRIL 5, 2021 4 Page 5 APPEARANCES..... 2 6 BY MR. FREEMAN..... 5 7 BY MR. PERRIN..... 107 8 BY MR. FREEMAN..... 109 9 10 Start time - 2:32 p.m. End time - 5:28 p.m. 11 Total pages: 115 12 13 WITNESS CORRECTIONS AND SIGNATURE..... 111 14 REPORTER'S CERTIFICATION..... 113 15 16 17 18 19 20 21 22 23 24 25	Page 3 1 SAI VATTANA, 2 having been first duly sworn, testified as follows: 3 E X A M I N A T I O N 4 BY MR. FREEMAN: 5 Q. Ms. Vattana, could you state your full name 6 for the record? 7 A. It's Padasamai Vattana, but known as Sai. I 8 go by Sai. 9 Q. Well, how would you prefer that I refer to 10 you today? 11 A. Sai. 12 Q. Sai. Okay. That's easier for me too. 13 Sai, my name is Jason Freeman. I represent 14 D&T Partners, which is the successor in interest to 15 ACET Venture Partners, LLC. 16 Do you understand that you're here today in 17 connection with a lawsuit between my client and ACET 18 Global and several Baymark-named entities and 19 Windspeed Trading, LLC? 20 A. Yes. 21 Q. Have you ever had to give your deposition 22 before? 23 A. No. 24 Q. Do you understand that you're here under oath 25 today?

2 (Pages 2 to 5)

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<p>1 A. Yes.</p> <p>2 Q. And you understand that that means you're 3 required by law to tell the truth and the complete 4 truth?</p> <p>5 A. Yes.</p> <p>6 Q. Just a few ground rules to help us make this 7 flow. If I ask a question, if you will, try to let me 8 complete it before you give an answer, just so that we 9 can keep a clean record for the court reporter.</p> <p>10 A. Okay.</p> <p>11 Q. And then that's a good lead-in to my next 12 one. Whenever I ask a question, if you will, try to 13 give a verbal response rather than nodding your head. 14 I do that a lot myself, but Ms. Denyce will get onto 15 us if we don't say the words out loud so she can type 16 them down.</p> <p>17 A. Okay.</p> <p>18 Q. If I ask a question that you don't 19 understand, just let me know. I ask bad questions all 20 the time, so just let me know.</p> <p>21 A. Okay.</p> <p>22 Q. And if you need to take a break at any point, 23 just let me know. We can take a restroom break, water 24 break, whatever you need. All I will probably ask is 25 that you just answer the -- if there's a question that</p>	<p>1 me questions, and I just have to answer it truthfully.</p> <p>2 Q. Okay. Did he get all of the employees 3 together at Windspeed to talk about the deposition?</p> <p>4 A. Yes.</p> <p>5 Q. Did he do that without Windspeed's attorney 6 present?</p> <p>7 A. I know we had -- there was attorneys and then 8 him as well and then the whole team.</p> <p>9 Q. Okay. Was there ever a time he did that 10 without the attorneys there?</p> <p>11 A. No.</p> <p>12 Q. Okay. Sai, are you currently an employee at 13 Windspeed Trading?</p> <p>14 A. Yes.</p> <p>15 Q. And what's your position?</p> <p>16 A. I'm a sales manager.</p> <p>17 Q. Sales manager.</p> <p>18 How long have you been in that position?</p> <p>19 A. About two to three years.</p> <p>20 Q. Okay. And what are your responsibilities in 21 that position?</p> <p>22 A. My responsibility is to sell to our 23 marketplaces --</p> <p>24 Q. Okay.</p> <p>25 A. -- and I'm also responsible for purchasing</p>
<p style="text-align: center;">Page 7</p> <p>1 I've asked that's on the table, I'll just ask that you 2 answer that, and then we can take a break whenever you 3 need.</p> <p>4 A. Okay.</p> <p>5 Q. Sai, what did you do to prepare for today's 6 deposition?</p> <p>7 A. I really didn't do anything to prepare.</p> <p>8 Q. Okay.</p> <p>9 A. Just came in here ready.</p> <p>10 Q. Did you -- go ahead.</p> <p>11 A. I just came here ready to just answer your 12 questions. So...</p> <p>13 Q. Did you discuss it with anyone?</p> <p>14 A. No.</p> <p>15 Q. Did you meet with anyone to prepare for it?</p> <p>16 A. No.</p> <p>17 Q. Okay. Did you speak with Bill Szeto 18 regarding your deposition?</p> <p>19 A. I talked to him regarding that there was a 20 deposition.</p> <p>21 Q. And what did he say?</p> <p>22 A. Just that there's going to be a deposition, 23 and to just -- the basis behind what a deposition is.</p> <p>24 Q. Okay. How did he explain it?</p> <p>25 A. Just this -- basically, they're just asking</p>	<p style="text-align: center;">Page 9</p> <p>1 items for our marketplaces.</p> <p>2 Q. Okay. Like acquiring inventory?</p> <p>3 A. Just any items that we need to sell, I'll 4 just sell through our vendor and such.</p> <p>5 Q. Okay. And I guess -- can you help me 6 understand what that means? Are you saying if people 7 order something, you go and source it, or do you --</p> <p>8 A. Yes.</p> <p>9 Q. -- go and find --</p> <p>10 [Simultaneous speaking.]</p> <p>11 A. Our marketplaces will ask for certain items, 12 and I'll help source them.</p> <p>13 Q. Okay.</p> <p>14 A. I'll help source it for them.</p> <p>15 Q. Okay. Is the company known for certain types 16 of items or certain items?</p> <p>17 A. No.</p> <p>18 Q. Why would they -- why do those marketplaces 19 come -- come to you and ask for certain things, 20 certain items?</p> <p>21 A. Just because they're -- we do a very good job 22 helping them out.</p> <p>23 Q. Okay.</p> <p>24 A. And so every item that we do help them, our 25 events are always successful.</p>

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<p>1 Q. And you said "events." What does that mean?</p> <p>2 A. So we'll have, like -- just, we'll work with</p> <p>3 the marketplaces, and then we'll run an event. So the</p> <p>4 duration could be from one to three days. So we would</p> <p>5 outsource that item for them if they're looking for a</p> <p>6 specific product.</p> <p>7 Q. Okay. When you say "event," does that</p> <p>8 mean -- does that basically mean like a sale and</p> <p>9 promotion of certain items?</p> <p>10 A. Yeah.</p> <p>11 Q. Okay.</p> <p>12 A. Yes.</p> <p>13 Q. Got it.</p> <p>14 And is -- working with these vendors,</p> <p>15 what -- how does that work? Is this -- are the</p> <p>16 products being marketed on their platform or on --</p> <p>17 A. Yes.</p> <p>18 Q. -- the company's?</p> <p>19 A. It's on their platform.</p> <p>20 Q. Okay. Is that like -- is that pretty much</p> <p>21 the whole business model?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Who are the key vendors?</p> <p>24 A. We have various vendors. So, for example,</p> <p>25 one of them would be Jane.</p>	<p>1 A. Rue La La.</p> <p>2 Q. How do you spell that?</p> <p>3 A. R-U-E, L-A, L-A.</p> <p>4 Q. Okay. And that's the third biggest.</p> <p>5 Who's the fourth and the fifth?</p> <p>6 A. I guess, Tanga and Zulily.</p> <p>7 Q. Okay. And so -- so am I understanding,</p> <p>8 Windspeed's products are marketed on their platforms?</p> <p>9 A. Yes.</p> <p>10 Q. And then when those are sold, those companies</p> <p>11 request Windspeed to fulfill those orders?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. In your position at Windspeed, do you</p> <p>14 work on the development of a vendor base?</p> <p>15 A. No.</p> <p>16 Q. No.</p> <p>17 To support a merchandise strategy?</p> <p>18 A. No.</p> <p>19 Q. Do you negotiate with vendors and suppliers?</p> <p>20 A. I'll negotiate the price, but that's pretty</p> <p>21 much it.</p> <p>22 Q. Okay. Do you -- do you negotiate the terms</p> <p>23 of sale or the payment terms?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. What about other aspects of the</p>
<p style="text-align: center;">Page 11</p> <p>1 Q. Jane is the name of the company?</p> <p>2 A. Uh-huh. Yes.</p> <p>3 Q. Who else can you think of?</p> <p>4 A. Tanga.</p> <p>5 Q. I'm sorry?</p> <p>6 A. Tanga.</p> <p>7 Q. Okay. Who else?</p> <p>8 A. eBay.</p> <p>9 Q. Okay. Any others?</p> <p>10 A. Zulily.</p> <p>11 Q. Those are the main ones?</p> <p>12 A. Uh-huh.</p> <p>13 Q. Okay. Who is -- you know, just in order of</p> <p>14 magnitude, who are the biggest vendors in terms of the</p> <p>15 amount of business that Windspeed does?</p> <p>16 A. Jane.</p> <p>17 Q. That's the biggest?</p> <p>18 A. I would say so, yes.</p> <p>19 Q. Okay. Who's the next biggest?</p> <p>20 A. UntilGone.</p> <p>21 Q. UntilGone?</p> <p>22 A. Uh-huh.</p> <p>23 Q. Is that "dawn" or "gone"?</p> <p>24 A. Gone. G-O-N-E.</p> <p>25 Q. Okay. And who's number three?</p>	<p style="text-align: center;">Page 13</p> <p>1 purchase?</p> <p>2 A. No.</p> <p>3 Q. No.</p> <p>4 Do you establish financial goals for sales?</p> <p>5 A. No.</p> <p>6 Q. Do you establish financial goals for</p> <p>7 inventory?</p> <p>8 A. No.</p> <p>9 Q. Do you establish financial goals for income</p> <p>10 tied to a merchandise strategy?</p> <p>11 A. No.</p> <p>12 Q. Do you coordinate opportunities or strategies</p> <p>13 to try to -- try to increase product sales?</p> <p>14 A. Yes.</p> <p>15 Q. Do you monitor the competition?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And do you monitor them to try to</p> <p>18 figure out the best merchandise pricing or offerings?</p> <p>19 A. Yes.</p> <p>20 Q. Do you -- do you develop, like, seasonal</p> <p>21 merchandise programs?</p> <p>22 A. No.</p> <p>23 Q. No.</p> <p>24 Do you coordinate with a logistics team for</p> <p>25 product delivery?</p>

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<p>1 A. Yes. 2 Q. Okay. Who do you report to, Sai, in your 3 position? 4 A. Bill. 5 Q. And who's that? Bill Szeto? 6 A. Bill Szeto, yes. 7 Q. Okay. And who signs your paychecks? 8 A. Bill. Bill Szeto. 9 Q. Who's the owner of Windspeed? 10 A. Bill Szeto. 11 Q. Okay. And how do you know that? 12 A. How do I know it's...? 13 Q. That Bill Szeto is the owner of Windspeed. 14 A. Because he's the one that created Windspeed. 15 Q. Okay. Do you know how long he's been the 16 owner? 17 A. I guess, two to three years. 18 Q. Okay. Are there other -- are there any other 19 owners of Windspeed? 20 A. No. 21 Q. Have you held any other positions at 22 Windspeed? 23 A. No. 24 Q. Tell me who else -- since you've been there, 25 who else has worked at Windspeed?</p>	<p>1 A. They unpack the merchandise and store it. 2 Q. Okay. Do they load it up into the warehouse? 3 A. Yes. 4 Q. Is anyone else involved in that process? 5 A. No. 6 Q. Who are the -- since you've been there, who 7 are the managers of Windspeed? 8 A. Bill Szeto. 9 Q. Just Bill? 10 A. Yes. 11 Q. Okay. Have you held any positions at ACET 12 Global? 13 A. I was doing sales for ACET Global. 14 Q. Okay. What was your position there? 15 A. Same -- same concept as was [as spoken] I'm 16 doing now. 17 Q. Okay. 18 A. So just handling the marketplaces. 19 Q. Okay. Have you ever worked for any company 20 with the name "Baymark" in it? 21 A. No. 22 Q. And are you currently an employee of ACET 23 Global? 24 A. No. 25 Q. So in terms of your position that you had at</p>
<p style="text-align: center;">Page 15</p> <p>1 A. It's only myself and my coworkers. 2 Q. Okay. And who are those? 3 A. Jane, Dana, and Paula. 4 Q. Jane, Dana, and Paula? 5 A. Yes. 6 Q. Okay. And what did they do? 7 A. Dana and Paula works in fulfillment, and Jane 8 does accounting. 9 Q. Okay. How is Dana and Paula's job -- how are 10 they different? 11 A. I don't know. 12 Q. What do you understand them to do? 13 A. I know that they just pack, and then Dana is 14 the one that handles all the reports. 15 Q. Okay. What else does Paula do? 16 A. She just packs, and she also sells on the 17 marketplaces. She kind of assists, if I need any 18 help. 19 Q. Okay. So Paula overlaps a little bit? 20 A. Yes. 21 Q. And when you say they're packing, is that 22 like packing stuff up to ship it to purchasers? 23 A. Yes. 24 Q. And is that unpacking inventory when it comes 25 in, or does someone else do that?</p>	<p style="text-align: center;">Page 17</p> <p>1 ACET Global, could you tell me a little more? It was 2 same concept -- I mean, is it pretty much exactly the 3 same thing, or is it a different position? 4 MR. PERRIN: Objection; form. 5 A. I was doing the same thing, just listing -- 6 the same concept. 7 Q. (BY MR. FREEMAN) Okay. Who were your big 8 vendors at ACET? 9 A. When you mean "vendors," you mean the 10 marketplaces? 11 Q. Yes, ma'am. 12 A. I can't remember. 13 Q. Okay. Were they -- were they different, or 14 was it the same? 15 MR. PERRIN: Objection; form. 16 A. It was the same. 17 Q. (BY MR. FREEMAN) Okay. Like, for example, 18 was Zulily one of the marketplaces? 19 A. Yes. 20 Q. Okay. How about eBay? 21 A. Yes. 22 Q. How about Jane? 23 A. Yes. 24 Q. How about Tanga? 25 A. I'm not sure.</p>

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<p>1 Q. Okay. What about UntilGone?</p> <p>2 A. I'm not sure.</p> <p>3 Q. Okay. What about Rue La La -- if I got that</p> <p>4 right.</p> <p>5 A. I don't know.</p> <p>6 Q. And why is it that you're not sure?</p> <p>7 A. Because I didn't handle those marketplaces.</p> <p>8 Q. Did someone else handle those?</p> <p>9 A. Yes.</p> <p>10 Q. Who handled those?</p> <p>11 A. It was a previous employee.</p> <p>12 Q. Who was the previous employee?</p> <p>13 A. Monica.</p> <p>14 Q. Okay. So tell me how that happened. How was</p> <p>15 Monica's job different from yours?</p> <p>16 A. She handled mainly the bigger marketplaces.</p> <p>17 Q. Okay. Did she train you?</p> <p>18 A. Yes.</p> <p>19 Q. How long was that?</p> <p>20 A. I guess -- I'm not sure.</p> <p>21 Q. Like a few months, or was it a week,</p> <p>22 relatively?</p> <p>23 A. Maybe a month.</p> <p>24 Q. Okay. Had Monica been there a while, or was</p> <p>25 she kind of new?</p>	<p>1 Q. Did anyone else replace her?</p> <p>2 A. No.</p> <p>3 Q. So after she left ACET Global, who was</p> <p>4 managing the vendor relationships or the marketplace</p> <p>5 relationships that she had managed?</p> <p>6 A. Eventually, when she left, I took over.</p> <p>7 Q. Okay. Can you address the question of</p> <p>8 whether you took over managing those marketplaces?</p> <p>9 A. Yes.</p> <p>10 Q. You did?</p> <p>11 A. Yes.</p> <p>12 Q. And so do you remember if you took over</p> <p>13 managing Jane?</p> <p>14 A. I've always handled Jane beforehand.</p> <p>15 Q. Did you manage Jane before transferring to</p> <p>16 Windspeed?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Did you manage Tanga before</p> <p>19 transferring to Windspeed?</p> <p>20 A. No.</p> <p>21 Q. No?</p> <p>22 A. No.</p> <p>23 Q. So was that acquired by Windspeed after the</p> <p>24 transition?</p> <p>25 A. Yes.</p>
<p style="text-align: center;">Page 19</p> <p>1 A. She was there before me.</p> <p>2 Q. Okay. So of those -- of the big platforms we</p> <p>3 talked about earlier, would you expect Monica to have</p> <p>4 overseen those or most of those --</p> <p>5 MR. PERRIN: Objection; form.</p> <p>6 Q. (BY MR. FREEMAN) -- if they were</p> <p>7 relationships?</p> <p>8 MR. PERRIN: Same objection.</p> <p>9 A. I don't know.</p> <p>10 Q. (BY MR. FREEMAN) So did you hold the same</p> <p>11 position the entire time you were at ACET Global?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Did you eventually oversee all of it,</p> <p>14 or was it always split with someone else?</p> <p>15 A. I had the same role; I've always had the same</p> <p>16 role.</p> <p>17 Q. Okay. At ACET, did you ever manage all of</p> <p>18 the platforms, or did you always split that with some</p> <p>19 other person?</p> <p>20 A. I've always had the same role.</p> <p>21 Q. Okay. Let me ask it this way: How</p> <p>22 long -- when did Monica leave ACET Global?</p> <p>23 A. I don't know.</p> <p>24 Q. Did she come to Windspeed?</p> <p>25 A. No.</p>	<p style="text-align: center;">Page 21</p> <p>1 Q. Okay. What about UntilGone, did you not</p> <p>2 manage that at ACET Global?</p> <p>3 A. No.</p> <p>4 Q. What about Rue La La?</p> <p>5 A. No.</p> <p>6 Q. Who did you report to while at ACET Global?</p> <p>7 A. Monica.</p> <p>8 Q. Okay. And what about after Monica left?</p> <p>9 A. I can't remember.</p> <p>10 Q. Was it Bill Szeto?</p> <p>11 A. I'm not sure.</p> <p>12 Q. Who hired you at ACET Global?</p> <p>13 A. Monica.</p> <p>14 Q. Monica?</p> <p>15 A. Monica and Tomer.</p> <p>16 Q. Tomer Dami?</p> <p>17 A. Yes.</p> <p>18 Q. What was Tomer's role at the time?</p> <p>19 A. He was the CEO.</p> <p>20 Q. Okay. And who did you understand to own ACET</p> <p>21 Global?</p> <p>22 A. I don't know.</p> <p>23 Q. What -- what happened to ACET Global?</p> <p>24 A. I don't know.</p> <p>25 Q. When you were at ACET Global, did you develop</p>

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<p>1 a vendor base?</p> <p>2 A. Can you repeat the question?</p> <p>3 Q. Yeah. Did you -- did you develop a vendor</p> <p>4 base to support a merchandise strategy?</p> <p>5 A. No.</p> <p>6 Q. Did you negotiate with vendors or suppliers?</p> <p>7 A. No.</p> <p>8 Q. Did you negotiate with vendors or suppliers</p> <p>9 with respect to the terms of sale or the cost?</p> <p>10 A. No.</p> <p>11 Q. Did you establish financial goals for sales?</p> <p>12 A. No.</p> <p>13 Q. Did you establish financial goals for</p> <p>14 inventory?</p> <p>15 A. No.</p> <p>16 Q. Did you establish financial goals for income</p> <p>17 related to a merchandise strategy?</p> <p>18 A. No.</p> <p>19 Q. Did you coordinate opportunities or</p> <p>20 strategies to try to increase product sales?</p> <p>21 A. Yes.</p> <p>22 Q. Did you monitor competition to ensure you had</p> <p>23 the best merchandise offerings?</p> <p>24 A. Yes.</p> <p>25 Q. Did you develop seasonal merchandise</p>	<p>1 sure I understand everything that is on here.</p> <p>2 You've got below that several items that</p> <p>3 reference, you know, things that you do or did.</p> <p>4 Is it fair to say that these items that</p> <p>5 you've got described below "Sales Account Manager,"</p> <p>6 that you did all of those both at ACET Global and at</p> <p>7 Windspeed Trading?</p> <p>8 A. I'm not sure.</p> <p>9 Q. Okay. Do you think you do all of these at</p> <p>10 Windspeed?</p> <p>11 A. Yes.</p> <p>12 Q. Do you think you did, basically, the same</p> <p>13 thing at ACET Global?</p> <p>14 A. Yes.</p> <p>15 Q. Just looking over these -- and take your</p> <p>16 time -- but looking over them, do you think you did</p> <p>17 all these same things when you were working at ACET</p> <p>18 Global?</p> <p>19 A. Yes. Again, I was trying to -- this is</p> <p>20 just -- like, I was still trying to update it.</p> <p>21 Q. I'm not the LinkedIn police. You're fine.</p> <p>22 I'm just -- I'm wondering because it references from</p> <p>23 2017 forward -- and, again, I understand that that</p> <p>24 covers your time at ACET Global as well; correct? Is</p> <p>25 that correct?</p>
<p>1 programs?</p> <p>2 A. No.</p> <p>3 Q. Okay. Did you coordinate with a logistics</p> <p>4 team for product delivery?</p> <p>5 A. Yes.</p> <p>6 Q. And Sai, I just want to put up on the screen</p> <p>7 what's marked as Exhibit 18 to this deposition.</p> <p>8 (Exhibit 18 marked/introduced.)</p> <p>9 Q. (BY MR. FREEMAN) Sai, do you recognize this</p> <p>10 printout?</p> <p>11 A. Yes.</p> <p>12 Q. And what is this?</p> <p>13 A. This is my LinkedIn.</p> <p>14 Q. Okay. And down at the bottom where it</p> <p>15 references "Experience," do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. You reference the "Sales Account Manager" of</p> <p>18 "Windspeed Trading"; is that correct?</p> <p>19 A. Yes.</p> <p>20 Q. And that you've been in that position since</p> <p>21 August of 2017; is that correct?</p> <p>22 A. Yes. But honestly, I wasn't too sure of it;</p> <p>23 I just put whatever month. I'm still actually</p> <p>24 updating this LinkedIn.</p> <p>25 Q. That's okay. I'm just -- just trying to make</p>	<p>1 A. No.</p> <p>2 Q. What day did you start working at Windspeed</p> <p>3 Trading, then?</p> <p>4 A. I believe, October.</p> <p>5 Q. October of what year?</p> <p>6 A. 2018.</p> <p>7 Q. Okay. Did you begin working for ACET Global</p> <p>8 in August of 2017?</p> <p>9 MR. PERRIN: Objection; form.</p> <p>10 A. I'm not sure.</p> <p>11 Q. (BY MR. FREEMAN) When do you think you worked</p> <p>12 at -- when do you think you began working at ACET</p> <p>13 Global?</p> <p>14 A. I --</p> <p>15 Q. Oh, go ahead. I'm sorry.</p> <p>16 A. I would think sometime in February, but I'm</p> <p>17 not sure what year.</p> <p>18 Q. Okay.</p> <p>19 A. It's been so long ago.</p> <p>20 Q. Sai, part of what I'm trying to understand</p> <p>21 is: Is it all listed as one job because it was -- it</p> <p>22 pretty much looked the same to you?</p> <p>23 MR. PERRIN: Objection; form.</p> <p>24 A. I'm sorry, can you repeat the question?</p> <p>25 Q. (BY MR. FREEMAN) Is it all listed as one job</p>

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<p>1 because it looked pretty much the same to you?</p> <p>2 A. Yes.</p> <p>3 Q. Was it pretty much indistinguishable?</p> <p>4 MR. PERRIN: Objection; form.</p> <p>5 A. I guess.</p> <p>6 Q. (BY MR. FREEMAN) Is that a "yes" or a --</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Sai, who is Tomer Damti, again?</p> <p>9 A. He's the CEO of ACET Global.</p> <p>10 Q. Okay. And when did you first meet him?</p> <p>11 A. I don't remember.</p> <p>12 Q. Did you report to him initially?</p> <p>13 A. Not mainly.</p> <p>14 Q. Was it mainly to Monica?</p> <p>15 A. Mainly to Monica.</p> <p>16 Q. How would you describe Tomer as a boss or CEO?</p> <p>17 MR. PERRIN: Objection; form.</p> <p>18 A. I didn't really have a relationship with him, so I don't really know.</p> <p>19 Q. (BY MR. FREEMAN) What about Bill Szeto, when did you first meet Bill Szeto?</p> <p>20 A. I don't remember.</p> <p>21 Q. Was it during your time at ACET Global or after?</p>	<p>1 these. And if you truly can't remember, I understand; do your best.</p> <p>2 Did you ever report to Matt Denegre?</p> <p>3 MR. PERRIN: Objection; form.</p> <p>4 A. No, I --</p> <p>5 Q. (BY MR. FREEMAN) No?</p> <p>6 A. No, I didn't report to him.</p> <p>7 Q. Did you ever speak to him while he was at the building?</p> <p>8 MR. PERRIN: Objection; form.</p> <p>9 A. I may have said "Hi."</p> <p>10 Q. (BY MR. FREEMAN) Ever have any in-depth conversations or discussions about the business?</p> <p>11 A. No.</p> <p>12 Q. How often would he come by either ACET Global's or Windspeed's office?</p> <p>13 A. I don't remember. I'm not sure.</p> <p>14 Q. Talking like one or two times a year, or are we talking about maybe once a month or more?</p> <p>15 A. Maybe the times I've seen him, maybe twice.</p> <p>16 Again, I don't pay attention to what's going on outside of my office.</p> <p>17 Q. When you say "twice," is that twice a month or twice, like, that you've ever --</p> <p>18 A. Two times. Two times, I've seen him.</p>
<p>1 A. I don't remember.</p> <p>2 Q. Do you recall if you reported to him while you were at ACET Global?</p> <p>3 A. No.</p> <p>4 Q. You don't remember, or you --</p> <p>5 A. I don't remember.</p> <p>6 Q. Okay. What about Matt Denegre, who is Matt?</p> <p>7 A. I don't know him that well.</p> <p>8 Q. Okay.</p> <p>9 A. I don't know.</p> <p>10 Q. Who is he?</p> <p>11 A. All I know is that he worked with Baymark.</p> <p>12 Q. Baymark -- who's Baymark?</p> <p>13 A. I don't know. I just know that he worked with Baymark.</p> <p>14 Q. Did he work with ACET Global also?</p> <p>15 A. I don't know.</p> <p>16 Q. Okay. When did you first meet him?</p> <p>17 A. I don't remember.</p> <p>18 Q. Was it -- do you remember if it was when you were working at ACET Global?</p> <p>19 A. I don't remember.</p> <p>20 Q. And, Sai, I know you're on the hot seat, and this is -- this creates a lot of anxiety, but if you will, try and give me your best recollection of any of</p>	<p>1 Q. Two times --</p> <p>2 A. Two times, I mean total --</p> <p>3 Q. Total time. Okay.</p> <p>4 A. I can't tell you if it's twice a month or whatever, you know.</p> <p>5 Q. What about David Hook?</p> <p>6 A. I don't know who that is.</p> <p>7 Q. What about a gentleman named Tony Ludlow or Anthony Ludlow?</p> <p>8 A. I don't know who both of them -- I don't know who they are.</p> <p>9 Q. Okay. Let me ask you about a few companies and other people; if you will, just tell me if you are familiar with them or have heard of them.</p> <p>10 Steven Bellah?</p> <p>11 A. I don't know who that person is.</p> <p>12 Q. Okay. Marc Cole?</p> <p>13 A. I don't know who that person is.</p> <p>14 Q. Super G Capital?</p> <p>15 A. I recall that's a bank.</p> <p>16 Q. Okay. Is that about it?</p> <p>17 A. Yeah.</p> <p>18 Q. What about Baymark ACET Holdco?</p> <p>19 A. I recall Baymark.</p> <p>20 Q. The name "Baymark"?</p>

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<p>1 A. Yeah.</p> <p>2 Q. If I said other entities like Baymark ACET</p> <p>3 Direct Invest or Baymark Management or Baymark</p> <p>4 Partners, would those make any difference, or is it</p> <p>5 just Baymark?</p> <p>6 A. Yeah, all I know is Baymark.</p> <p>7 Q. Okay. Do you recall when Tomer Damti's role</p> <p>8 as CEO of ACET Global ended?</p> <p>9 A. I don't remember.</p> <p>10 Q. Okay. Do you remember if that was in</p> <p>11 February of 2018?</p> <p>12 A. I don't remember.</p> <p>13 Q. Do you remember what the circumstances of him</p> <p>14 leaving that role were?</p> <p>15 A. No.</p> <p>16 Q. Do you remember any -- well, when he left, do</p> <p>17 you know if he was fired or if he chose to leave?</p> <p>18 A. I don't know.</p> <p>19 Q. Do you remember if it concerned you or not?</p> <p>20 A. No.</p> <p>21 Q. It didn't concern you?</p> <p>22 A. No.</p> <p>23 Q. And why is that?</p> <p>24 A. Because it's not my business.</p> <p>25 Q. Were you upset at all?</p>	<p>1 A. She told that to the team so --</p> <p>2 [Simultaneous speaking.]</p> <p>3 A. -- so the people that were working at that</p> <p>4 time.</p> <p>5 Q. (BY MR. FREEMAN) Was that everybody but Bill?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. How did everyone respond?</p> <p>8 A. Just surprised.</p> <p>9 Q. Who was surprised?</p> <p>10 A. Dana and Paula.</p> <p>11 Q. Were both surprised?</p> <p>12 A. (Nods head.)</p> <p>13 Q. What did they say? What did Dana say?</p> <p>14 A. I don't remember.</p> <p>15 Q. What about Paula?</p> <p>16 A. I don't remember.</p> <p>17 Q. Did they seem --</p> <p>18 A. Just their reaction. Their reaction. We</p> <p>19 were all surprised.</p> <p>20 Q. That he had been fired?</p> <p>21 A. Uh-huh.</p> <p>22 Q. Was there any sign of it coming? Like,</p> <p>23 looking back, did y'all see it coming?</p> <p>24 A. No.</p> <p>25 Q. Everybody was just surprised?</p>
<p>1 A. Not really.</p> <p>2 Q. Can you remember having any discussions with</p> <p>3 anyone about it?</p> <p>4 A. No.</p> <p>5 Q. Do you remember if anyone was upset or</p> <p>6 concerned about it?</p> <p>7 A. I don't remember.</p> <p>8 Q. Was anything communicated to you about</p> <p>9 Mr. Damti leaving?</p> <p>10 A. No.</p> <p>11 Q. Was anything communicated to any of the other</p> <p>12 employees about Mr. Damti leaving?</p> <p>13 A. I was actually just told that he was</p> <p>14 leaving -- like, that he had been fired.</p> <p>15 Q. Who told you that?</p> <p>16 A. I believe it was Monica.</p> <p>17 Q. And what did Monica say about it?</p> <p>18 A. She told me -- or she told us that Tomer had</p> <p>19 been fired.</p> <p>20 Q. Was she upset about it?</p> <p>21 A. Yes.</p> <p>22 Q. What else did she say? Why was she upset?</p> <p>23 A. I'm not sure. I would assume because they'd</p> <p>24 worked together for years.</p> <p>25 Q. Who all did she tell that to?</p>	<p>1 A. Yes.</p> <p>2 MR. PERRIN: Form.</p> <p>3 Q. (BY MR. FREEMAN) And there wasn't any kind of</p> <p>4 debriefing of the team to talk about it?</p> <p>5 A. No.</p> <p>6 Q. Did you find that odd, given the size of the</p> <p>7 team?</p> <p>8 A. What do you mean "the size of the team"?</p> <p>9 Q. It seems like it was a relatively small or</p> <p>10 close-knit team. Is that how you would describe it,</p> <p>11 or not?</p> <p>12 A. I would say so, yeah, just because it was</p> <p>13 only like two people and then myself.</p> <p>14 Q. Did you find it odd that there was no</p> <p>15 discussion about it?</p> <p>16 MR. PERRIN: Objection; form.</p> <p>17 A. I honestly don't have any feeling towards it.</p> <p>18 Q. (BY MR. FREEMAN) Did anybody talk about going</p> <p>19 to have a drink with Tomer?</p> <p>20 A. No.</p> <p>21 Q. Calling him to see how he was?</p> <p>22 A. No.</p> <p>23 Q. Just no discussion really?</p> <p>24 A. No.</p> <p>25 Q. Okay. Did anybody write an email about it?</p>

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<p>1 MS. HARD-WILSON: Objection; form.</p> <p>2 A. No.</p> <p>3 Q. (BY MR. FREEMAN) Were there any texts -- text</p> <p>4 messages going around about it?</p> <p>5 MR. PERRIN: Objection; form.</p> <p>6 A. No.</p> <p>7 Q. (BY MR. FREEMAN) What happened right after</p> <p>8 Tomer left ACET Global?</p> <p>9 A. Just operated the same because this is the</p> <p>10 same job as I was before.</p> <p>11 Q. Okay.</p> <p>12 A. Just doing the same role.</p> <p>13 Q. What about with the company, generally? Were</p> <p>14 there any big changes?</p> <p>15 A. No.</p> <p>16 Q. Was there a change in employees?</p> <p>17 A. No.</p> <p>18 Q. Was there a change in, like, the type of</p> <p>19 business that it did?</p> <p>20 A. No.</p> <p>21 Q. Was there a change in performance, the</p> <p>22 business' performance?</p> <p>23 A. No.</p> <p>24 Q. Did someone else come on as CEO?</p> <p>25 A. No.</p>	<p>1 office to talk about how the company was performing?</p> <p>2 A. No.</p> <p>3 Q. Did anyone send around an email expressing</p> <p>4 any concern about how the company was performing?</p> <p>5 A. No.</p> <p>6 Q. From your perspective, was the company sales</p> <p>7 doing poorly?</p> <p>8 A. I don't know that information.</p> <p>9 Q. Were you slow at your job, slower than you</p> <p>10 had been in the past?</p> <p>11 A. I'm sorry, what? Repeat that question.</p> <p>12 Q. Were you really busy at that time?</p> <p>13 A. There were days we were busy.</p> <p>14 Q. Okay. Was -- was that different than in the</p> <p>15 past?</p> <p>16 A. No.</p> <p>17 Q. In the past, would there be days where you</p> <p>18 were really busy and some days not as busy?</p> <p>19 A. Right. Yes.</p> <p>20 Q. And did it seem like you were -- were you as</p> <p>21 busy? Were you busier? Were you not as busy as in</p> <p>22 the past, when Tomer was fired?</p> <p>23 A. There were just days that we were busy, and</p> <p>24 some days we weren't.</p> <p>25 Q. Okay. After Tomer was fired, were there any</p>
<p>1 Q. What about Mr. Szeto?</p> <p>2 A. I don't remember.</p> <p>3 Q. You don't remember if Mr. Szeto came on to</p> <p>4 replace Tomer?</p> <p>5 A. Yeah.</p> <p>6 [Simultaneous speaking.]</p> <p>7 A. Sorry. I don't remember.</p> <p>8 Q. (BY MR. FREEMAN) Oh, you don't remember that?</p> <p>9 A. Yeah.</p> <p>10 Q. Just so I'm clear -- I think I understood</p> <p>11 what you just said, but just so I'm clear: You're not</p> <p>12 saying Bill Szeto came on to replace Tomer; correct?</p> <p>13 A. Yes.</p> <p>14 Q. You're saying you can't remember if he did?</p> <p>15 A. Right. I wasn't -- I was just told to just</p> <p>16 do my job, and that's it.</p> <p>17 Q. Who fired Tomer Damti?</p> <p>18 A. I don't know.</p> <p>19 Q. Did anyone -- let me ask -- when Tomer was</p> <p>20 fired, had the company been performing poorly?</p> <p>21 A. I don't remember.</p> <p>22 Q. Do you remember anyone at the company being</p> <p>23 concerned about the company's performance?</p> <p>24 A. No.</p> <p>25 Q. Do you remember anyone having meetings at the</p>	<p>1 meetings to discuss the company's performance?</p> <p>2 A. No.</p> <p>3 Q. After he was fired, were there any emails</p> <p>4 circulated expressing concern about the company's</p> <p>5 performance?</p> <p>6 A. No.</p> <p>7 Q. After he was fired, did you see business</p> <p>8 dropping?</p> <p>9 A. No.</p> <p>10 Q. After he was fired, did it seem like the</p> <p>11 company was about the same in terms of how busy it</p> <p>12 was?</p> <p>13 A. Yes.</p> <p>14 Q. Now, who started Windspeed?</p> <p>15 A. Bill -- Bill Szeto.</p> <p>16 Q. Bill Szeto. And do you know when he did</p> <p>17 that?</p> <p>18 A. I want to say in October.</p> <p>19 Q. What year is that?</p> <p>20 A. 2018.</p> <p>21 Q. And why do you believe it was October of</p> <p>22 2018?</p> <p>23 A. I believe he had reached out at that time.</p> <p>24 Q. And what do you mean by "reached out" at that</p> <p>25 time?</p>

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<p>1 A. I'm sorry, "reached out" as in we were 2 working at that time. 3 Q. And I'm not sure I understand. Could you 4 elaborate? 5 A. We were working in October 2018 as Windspeed. 6 Q. Okay. And why is that? 7 A. Because we started working as Windspeed in 8 October. 9 Q. Are you sure it wasn't September? 10 A. I don't -- no. 11 Q. Pretty sure it wasn't? 12 A. I'm pretty sure -- I think it was in October. 13 Q. Are you sure it wasn't in November? 14 MR. PERRIN: Objection; form. 15 MS. HARD-WILSON: Objection; form. 16 A. No. 17 Q. (BY MR. FREEMAN) And why are you sure of 18 that? 19 MR. PERRIN: Objection; form. 20 A. I just -- I just remember it was in October. 21 Q. (BY MR. FREEMAN) And what is it that makes 22 you so sure it was in October? 23 A. Because of when we communicated. 24 Q. And how did you communicate? 25 A. Through phone.</p>	<p>1 A. Yes. 2 Q. When did you stop working at the ACET office? 3 A. I believe, in September. 4 Q. And what year was that? 5 A. 2018. 6 Q. Okay. And did you work from somewhere else 7 after that? 8 A. No. 9 Q. Did you work after that? 10 A. No. 11 Q. Were you unemployed? 12 A. Yes. 13 Q. How long were you unemployed? 14 A. For a couple weeks. 15 Q. Okay. When was that? 16 A. In September, I believe. 17 Q. September of 2018? 18 A. Yes. 19 Q. And do you remember how -- like, until when 20 you were unemployed? 21 A. For a couple weeks -- 22 Q. Okay. 23 A. -- after September -- after September. 24 Q. Do you remember what day in September? 25 A. No.</p>
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<p>1 Q. And how did that happen? 2 A. He just called me. 3 Q. Okay. What did he say? 4 A. "We're going to start working as Windspeed." 5 Q. Okay. And what did you say? 6 A. I said "Okay." 7 Q. Okay. And was that all? 8 A. Yes. 9 Q. What day did he call you? 10 A. I don't remember. 11 Q. What makes you remember it was in October? 12 MR. PERRIN: Objection; form. 13 A. Just because I -- probably from the emails. 14 Q. (BY MR. FREEMAN) Okay. You -- 15 A. Sorry. I really don't know. 16 Q. No, that's okay. I just realized we've not 17 had the recording on, so I'm going to start that. I 18 meant to start that at the beginning. 19 (Break.) 20 Q. (BY MR. FREEMAN) Sai, where was the ACET 21 office at? 22 A. I don't remember the address. 23 Q. Okay. Do you remember what city it was in? 24 A. Plano. 25 Q. Okay. Were you working in that ACET office?</p>	<p>1 Q. Were you fired? 2 A. Yes. 3 Q. Who fired you? 4 A. Bill. 5 Q. How did Bill fire you? 6 A. He sent me a termination letter. 7 Q. Okay. And how did he send that letter to 8 you? 9 A. Through email. 10 Q. Your company email? 11 A. It was the ACET Global's email. 12 Q. Okay. What did that letter say? 13 A. That I was just being terminated. 14 Q. Okay. Didn't give any explanation? 15 A. I don't remember. 16 Q. Did you talk to Bill about that? 17 A. No. 18 Q. No conversations with him about it? 19 A. No, he just sent us that letter. 20 Q. Did he send it to everyone at the same time? 21 A. I don't know. I don't know. 22 Q. Was it only you that was on that email? 23 A. I believe so. 24 Q. Okay. Sai, where were you when you received 25 that email?</p>

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<p>1 A. I don't remember.</p> <p>2 Q. Were you working at the ACET office?</p> <p>3 MS. HARD-WILSON: Objection; form.</p> <p>4 A. I think so.</p> <p>5 Q. (BY MR. FREEMAN) What makes you think that?</p> <p>6 A. There are times where I was able to work from home.</p> <p>7 Q. Okay. And when were those?</p> <p>8 A. Just days I was able to work from home.</p> <p>9 Q. How often did you work from home?</p> <p>10 A. Not very often, but there were times where I was able to.</p> <p>11 Q. Could you give me some idea how often?</p> <p>12 A. Maybe once every other week.</p> <p>13 Q. Okay. Did you ask permission to do that?</p> <p>14 A. Yes.</p> <p>15 Q. And who did you ask permission to?</p> <p>16 A. I asked Bill.</p> <p>17 Q. Would you ask him by email or in person?</p> <p>18 A. It just depends. It could be in person, email.</p> <p>19 Q. Okay.</p> <p>20 A. By phone.</p> <p>21 Q. But I believe you said you believed you were at the ACET office when you received that email from</p>	<p>1 message about it?</p> <p>2 MS. HARD-WILSON: Objection; form.</p> <p>3 A. No.</p> <p>4 Q. (BY MR. FREEMAN) How is it that you know you didn't do that?</p> <p>5 MR. PERRIN: Objection; form.</p> <p>6 A. Because I -- I had no business talking about it.</p> <p>7 Q. (BY MR. FREEMAN) And why did you have no business talking about it?</p> <p>8 A. Because I was terminated. It's not nobody's business.</p> <p>9 Q. Did you talk to any of the other employees?</p> <p>10 MS. HARD-WILSON: Objection; form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. FREEMAN) Who did you talk to?</p> <p>13 A. My coworkers.</p> <p>14 Q. Okay. Who, specifically? Or was it --</p> <p>15 A. All of them.</p> <p>16 Q. Okay. Start with Dana. What did you talk to Dana about?</p> <p>17 A. That we were terminated.</p> <p>18 Q. Okay. What did Dana say?</p> <p>19 A. I mean, I don't remember.</p> <p>20 Q. Where did you talk to her at?</p>
<p>1 Bill?</p> <p>2 A. I can't remember. It could be when I was at the office, or it could be when I was home. I don't remember.</p> <p>3 Q. Okay. What did you do after receiving that email?</p> <p>4 A. I just accepted it.</p> <p>5 Q. Okay.</p> <p>6 A. I was terminated.</p> <p>7 Q. Were you upset?</p> <p>8 A. Of course. I was terminated.</p> <p>9 Q. Okay. What did you do?</p> <p>10 A. I just accepted it and just processed -- have time to process it.</p> <p>11 Q. Did you talk to anybody about it?</p> <p>12 MS. HARD-WILSON: Objection; form.</p> <p>13 A. Not really.</p> <p>14 [Simultaneous speaking.]</p> <p>15 A. Not really.</p> <p>16 Q. (BY MR. FREEMAN) Didn't talk to anybody?</p> <p>17 A. No.</p> <p>18 Q. Did you write to anybody about it?</p> <p>19 A. No.</p> <p>20 MS. HARD-WILSON: Object to form.</p> <p>21 Q. (BY MR. FREEMAN) Did you send anybody a text</p>	<p>1 A. I don't remember.</p> <p>2 Q. Did you talk to her by phone?</p> <p>3 A. I don't remember.</p> <p>4 Q. Did you talk to her in person?</p> <p>5 A. I don't remember.</p> <p>6 Q. Did she come by your office to talk about it?</p> <p>7 MS. HARD-WILSON: Objection; form.</p> <p>8 A. I don't remember.</p> <p>9 Q. (BY MR. FREEMAN) You don't remember?</p> <p>10 A. I don't remember.</p> <p>11 Q. Who else did you talk with about it?</p> <p>12 A. I talked to my coworkers.</p> <p>13 Q. Okay. And what's another coworker that you talked with?</p> <p>14 A. My coworkers are Dana and Paula.</p> <p>15 Q. Okay. What about Jane?</p> <p>16 A. Oh, yes. Sorry. Jane too.</p> <p>17 Q. Jane?</p> <p>18 A. It's been so long.</p> <p>19 Q. Did Paula get fired too?</p> <p>20 A. I believe so. He terminated everyone.</p> <p>21 Q. At the same time?</p> <p>22 A. I believe so, yes.</p> <p>23 Q. Okay. What did Paula say to you about it?</p> <p>24 A. Just the same reaction.</p>

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<p>1 Q. Was Paula upset? 2 A. I mean, I don't remember. 3 Q. Did -- was Paula mad at Bill? 4 MS. HARD-WILSON: Objection; form. 5 A. I don't remember. 6 Q. (BY MR. FREEMAN) Did Paula start looking for 7 a new job? 8 A. I don't know if she did. 9 Q. What about Jane? Did you talk to Jane about 10 it? 11 A. No. 12 Q. You didn't talk to Jane about being 13 terminated? 14 A. I mean, we all -- 15 MS. HARD-WILSON: Objection; form. 16 A. We all knew we were terminated. 17 Q. (BY MR. FREEMAN) So you didn't talk about it? 18 A. Not really. 19 Q. Did you start looking for a new job? 20 A. No. 21 Q. Did you have a lot of money in savings? 22 A. I don't feel comfortable answering that 23 question. 24 Q. Sai, I don't mean to ask uncomfortable 25 questions, but you do have to answer the questions</p>	<p>1 savings did you have at the time? 2 MR. PERRIN: Objection; form. 3 A. I don't remember. 4 Q. (BY MR. FREEMAN) Was it a year's worth of 5 savings? 6 MR. PERRIN: Objection; form. 7 Q. (BY MR. FREEMAN) Was it a year's worth of 8 savings, Sai? 9 MR. PERRIN: Objection; form. 10 MS. HARD-WILSON: Objection; form. 11 A. I don't remember. 12 Q. (BY MR. FREEMAN) Sai, did you do anything to 13 start looking for a new job? 14 MR. PERRIN: Objection; form. 15 MS. HARD-WILSON: Object to the form. 16 A. No. 17 Q. (BY MR. FREEMAN) Why? 18 A. Because I was a student, so my other focus 19 was also being a student. 20 Q. Okay. 21 A. I had time for that, for school. 22 Q. Okay. Why were you working in the first 23 place? 24 A. To pay off my school. To have a roof under 25 my head -- or over my head.</p>
<p style="text-align: center;">Page 47</p> <p>1 that I ask. 2 MR. PERRIN: Objection; form. 3 Q. (BY MR. FREEMAN) Did you have -- how much 4 money did you have in savings at that time, Sai? 5 MR. PERRIN: Objection; form. 6 MS. HARD-WILSON: Objection; form. 7 A. I don't know. I'm not going to answer that 8 question. 9 Q. (BY MR. FREEMAN) Did you have to pay rent at 10 that time, Sai? 11 A. Yes. 12 Q. Did anyone pay your rent for you? 13 A. I pay my own rent. 14 Q. Okay. What else did you have to pay for? 15 MR. PERRIN: Objection; form. 16 Q. (BY MR. FREEMAN) Sai, when they object, that 17 doesn't mean -- 18 A. I know. I understand what that means. I 19 have -- I don't know -- I pay my phone bill. I go to 20 school, so I have to pay for school. I had a car at 21 that time, so I had to pay off my car. 22 Q. Okay. Anything else? 23 A. Utilities for -- 24 Q. Utilities. 25 Sai, did you have -- how many months of</p>	<p style="text-align: center;">Page 49</p> <p>1 Q. Okay. When did you graduate? 2 A. When did I graduate? 3 Q. Yes, ma'am. 4 A. I'm still in school. 5 Q. Okay. Are you still working? 6 A. Yes. 7 Q. Why do you still work? 8 A. To pay for my school. 9 Q. Okay. 10 A. And to pay for my bills. 11 Q. Okay. How do you generally correspond with 12 Bill? 13 A. I report to him. 14 Q. Okay. And how do you correspond? By email? 15 By phone? 16 A. By email, phone. Right now, it's been email 17 and -- and by phone. 18 Q. Okay. Prior to -- in preparation for this 19 deposition today, did you review your phone records? 20 A. No. 21 Q. In preparation for this deposition today, did 22 you review your emails? 23 A. No. 24 Q. You started working for Windspeed -- or when 25 you switched over to Windspeed, was there a problem</p>

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<p>1 with ACET Global?</p> <p>2 MR. PERRIN: Objection; form.</p> <p>3 A. I don't know.</p> <p>4 Q. (BY MR. FREEMAN) Why did Bill switch to</p> <p>5 Windspeed?</p> <p>6 MR. PERRIN: Objection; form.</p> <p>7 MS. HARD-WILSON: Objection; form.</p> <p>8 A. I don't know.</p> <p>9 Q. (BY MR. FREEMAN) When he terminated you from</p> <p>10 ACET Global, did he indicate why he wasn't continuing</p> <p>11 ACET Global?</p> <p>12 A. No.</p> <p>13 Q. Did you receive any kind of formal offer of</p> <p>14 employment from Windspeed?</p> <p>15 A. No.</p> <p>16 Q. Did you enter into an employment contract</p> <p>17 with Windspeed?</p> <p>18 MR. PERRIN: Objection; form.</p> <p>19 A. I don't remember if there was.</p> <p>20 Q. (BY MR. FREEMAN) Was there an onboarding</p> <p>21 process with Windspeed?</p> <p>22 A. Yes.</p> <p>23 Q. What was that?</p> <p>24 A. Just to -- just for us to sign on as</p> <p>25 Windspeed.</p>	<p>1 for ACET Global?</p> <p>2 A. No.</p> <p>3 Q. Sai, can you describe the transition from</p> <p>4 ACET to Windspeed?</p> <p>5 MR. PERRIN: Objection; form.</p> <p>6 A. There was no transition.</p> <p>7 Q. (BY MR. FREEMAN) What do you mean by that?</p> <p>8 A. They're two different companies. So we</p> <p>9 were -- there's no transition.</p> <p>10 Q. Okay. Did anyone ever have any</p> <p>11 communications with you about switching from ACET</p> <p>12 Global to Windspeed?</p> <p>13 MR. PERRIN: Objection; form.</p> <p>14 A. No.</p> <p>15 Q. (BY MR. FREEMAN) Were there ever any meetings</p> <p>16 about switching from ACET Global to Windspeed?</p> <p>17 A. No.</p> <p>18 Q. Were there ever any conversations with anyone</p> <p>19 about switching from ACET Global to Windspeed?</p> <p>20 MS. HARD-WILSON: Objection; form.</p> <p>21 A. No.</p> <p>22 Q. (BY MR. FREEMAN) Were there ever any phone</p> <p>23 calls about switching from ACET Global to Windspeed?</p> <p>24 A. No.</p> <p>25 MS. HARD-WILSON: Objection; form.</p>
<p>1 Q. What does that mean?</p> <p>2 A. That we're now Winds- -- a new company.</p> <p>3 Q. Okay. Can you explain? I'm not</p> <p>4 understanding.</p> <p>5 MR. PERRIN: Objection; form.</p> <p>6 A. That we're a new company, and that -- just</p> <p>7 the sign-on process; like, our W-2s and all that.</p> <p>8 Q. (BY MR. FREEMAN) Okay. Was there any kind of</p> <p>9 training?</p> <p>10 A. No.</p> <p>11 Q. So -- it was just kind of tax paperwork; is</p> <p>12 that mostly it?</p> <p>13 A. Right.</p> <p>14 Q. Okay. Did you start working at a new</p> <p>15 location?</p> <p>16 A. What do you mean? Like, when did I start?</p> <p>17 Q. With Windspeed.</p> <p>18 A. I believe I was working at home at the time.</p> <p>19 Q. Did you get a new email address?</p> <p>20 A. When I worked for Windspeed, yes, I got a new</p> <p>21 email address.</p> <p>22 Q. Okay. Did you continue to use the old</p> <p>23 address at all?</p> <p>24 A. No.</p> <p>25 Q. Did Windspeed ever pay you for work you did</p>	<p>1 Q. (BY MR. FREEMAN) Were there ever any emails</p> <p>2 about switching from ACET Global to Windspeed?</p> <p>3 MS. HARD-WILSON: Objection; form.</p> <p>4 A. No.</p> <p>5 Q. (BY MR. FREEMAN) Were there ever any text</p> <p>6 messages about switching from ACET Global to</p> <p>7 Windspeed?</p> <p>8 MS. HARD-WILSON: Objection; form.</p> <p>9 A. No.</p> <p>10 Q. (BY MR. FREEMAN) How did Windspeed compare to</p> <p>11 ACET Global?</p> <p>12 MR. PERRIN: Objection; form.</p> <p>13 A. There was no comparison.</p> <p>14 Q. (BY MR. FREEMAN) What do you mean by that?</p> <p>15 MR. PERRIN: Objection; form.</p> <p>16 A. It's not the -- it's separate companies.</p> <p>17 Q. (BY MR. FREEMAN) Okay. I mean, did</p> <p>18 they -- did they have the same CEO?</p> <p>19 A. No.</p> <p>20 Q. No?</p> <p>21 Did they have the same products?</p> <p>22 A. I'm not sure.</p> <p>23 Q. Weren't you in charge of sales, though?</p> <p>24 MR. PERRIN: Objection; form.</p> <p>25 A. Yes.</p>

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<p>1 Q. (BY MR. FREEMAN) Did they have the same 2 products? 3 MR. PERRIN: Objection; form. 4 MS. HARD-WILSON: Objection; form. 5 A. Yes. 6 Q. (BY MR. FREEMAN) Sai, did they run the same 7 business? 8 MR. PERRIN: Objection; form. 9 A. It was the same model of business. 10 Q. (BY MR. FREEMAN) Sai, did they have the same 11 employees? 12 A. As ACET Global? 13 Q. Yes, ma'am. 14 A. Yes. 15 Q. Sai, did they have the same website as ACET 16 Global? 17 A. No. 18 Q. Are you sure about that? 19 MR. PERRIN: Objection; form. 20 A. I don't think there's a -- no. 21 Q. (BY MR. FREEMAN) Okay. 22 A. I don't think there's a website that's ACET 23 Global. 24 Q. Okay. Is there a website that ACET Global 25 used?</p>	<p>1 at the time? 2 A. Pretty much. 3 Q. Okay. And what was the other website you 4 mentioned? 5 A. Koolulu. 6 Q. Koolulu. What was that? 7 A. That was just a website we used at the time 8 to list products. 9 Q. Okay. Did ACET Global list products on 10 there? 11 A. ACET Global? 12 Q. Yes, ma'am. 13 A. I believe so. 14 Q. Did it sell products on there? 15 A. I'm not sure. I wasn't really managing that 16 website, so I'm not sure. 17 Q. You didn't manage that while you were at ACET 18 Global? 19 A. No, I was told from Monica to add products on 20 there. 21 Q. Okay. What kind of products? 22 A. Just whatever products she asked me to list 23 on there. 24 Q. What's an example? 25 A. I can't remember.</p>
<p>Page 55</p> <p>1 MS. HARD-WILSON: Objection; form. 2 A. I know that there was a website that ACET 3 Global used. 4 Q. (BY MR. FREEMAN) Do you know what that 5 website was? 6 A. I think it was Koolulu. 7 Q. Koolulu.com? 8 A. Yeah. 9 Q. Okay. Was there another one, Sai? 10 A. I believe, LuLuway. 11 Q. Luluway.com? 12 A. Yes. 13 Q. Okay. Was that what ACET Global used? 14 A. Yes. 15 Q. And what was LuLuway? 16 A. I wasn't really familiar with it. I know 17 they used LuLuway. 18 Q. Okay. Do you know what they used it for? 19 A. To sell products on. 20 Q. Okay. What kind of products? 21 A. There wasn't really specific product. It was 22 just random products that we were selling. It could 23 be from electronics to home, kitchen. It was various 24 type of products. 25 Q. Kind of whatever they wanted to put on there</p>	<p>Page 57</p> <p>1 Q. Fair enough. 2 Was there any -- was there any reason to add 3 on there like "needed to increase sales" or -- 4 A. No. 5 Q. Okay. 6 A. She just asked me to add these products, and 7 that's what I did. 8 Q. Okay. Did LuLuway, did that have a logo with 9 it? 10 A. I believe so. 11 Q. What about Koolulu? 12 A. Yes. 13 Q. Okay. Would you recognize those if you saw 14 them? 15 A. Yes. 16 Q. Okay. Whenever -- whenever -- well, during 17 the transition, let's say, you had from ACET Global to 18 Windspeed, was there any confusion on the part of 19 anyone about -- about the change? 20 MS. HARD-WILSON: Objection; form. 21 A. I'm sorry, can you repeat that question? 22 Q. (BY MR. FREEMAN) Yeah, when you 23 transitioned -- everyone transitioned from ACET Global 24 to Windspeed Trading, was there any confusion about 25 the changeover to Windspeed?</p>

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<p>1 MR. PERRIN: Objection; form.</p> <p>2 A. I don't know.</p> <p>3 Q. (BY MR. FREEMAN) Did any -- did any of the</p> <p>4 vendors get -- get them mixed up?</p> <p>5 MR. PERRIN: Objection; form.</p> <p>6 A. I don't recall.</p> <p>7 Q. (BY MR. FREEMAN) Okay. Let me ask you on... (Exhibit 19 marked/introduced.)</p> <p>8 Q. (BY MR. FREEMAN) Sai, can you see what's on</p> <p>9 your screen listed as Exhibit 19 to this deposition?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Do you recognize this correspondence?</p> <p>12 A. Yes.</p> <p>13 Q. What is this?</p> <p>14 A. This looks like an email that I tried to help</p> <p>15 Jane with in regards to the 1099-K.</p> <p>16 Q. What happened here?</p> <p>17 MR. PERRIN: Objection; form.</p> <p>18 A. I'm not really sure. I was just told what</p> <p>19 Jane needed to help with, and I just used that to help</p> <p>20 convey that by email. I'm not really sure what was</p> <p>21 the issue with that.</p> <p>22 Q. (BY MR. FREEMAN) Sai, I will scroll through</p> <p>23 this just so you can see the correspondence.</p> <p>24 Did Groupon get ACET Global and Windspeed</p>	<p>1 Do you recognize this document, Sai?</p> <p>2 A. You mean the response?</p> <p>3 Q. Yes, ma'am.</p> <p>4 A. Yes. That looks like an email I sent.</p> <p>5 Q. Okay. Does this look like -- does this</p> <p>6 appear to be a true and correct copy of an email that</p> <p>7 you sent on January 18, 2021?</p> <p>8 A. This does look like an email I've sent.</p> <p>9 Q. Okay. And did you state that "We've sent you</p> <p>10 the updated W9 from Acet Global but haven't heard a</p> <p>11 response since"?</p> <p>12 A. I did say that, yes. But there was a mixup</p> <p>13 between the W-9 that I wasn't really sure of.</p> <p>14 Q. Okay. But was that a W-9 from ACET Global?</p> <p>15 MR. PERRIN: Objection; form.</p> <p>16 A. If you go scroll down -- are you asking me if</p> <p>17 that was the W-9?</p> <p>18 Q. (BY MR. FREEMAN) Yes, ma'am. Did you send a</p> <p>19 W-9 from ACET Global?</p> <p>20 A. That was a W-9 that Jane had sent. So if I</p> <p>21 did send it, it was because I had received it from</p> <p>22 her.</p> <p>23 Q. Okay. Do you know if Windspeed sent a W-9</p> <p>24 to -- a W-9 for ACET to Groupon in 2021?</p> <p>25 A. I don't know.</p>
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<p>1 mixed up?</p> <p>2 MR. PERRIN: Objection; form.</p> <p>3 A. From the looks of it, yes.</p> <p>4 Q. (BY MR. FREEMAN) And did they report income</p> <p>5 for the wrong company?</p> <p>6 MS. HARD-WILSON: Objection; form.</p> <p>7 A. It looks like it, yes.</p> <p>8 Q. (BY MR. FREEMAN) Sai, do you remember if</p> <p>9 Groupon reported ACET's income to Windspeed Trading?</p> <p>10 MR. PERRIN: Objection; form.</p> <p>11 A. That may have been the mistake, yes.</p> <p>12 Q. (BY MR. FREEMAN) Okay. Do you know if</p> <p>13 that -- do you know why that occurred?</p> <p>14 A. No.</p> <p>15 MS. HARD-WILSON: Objection; form.</p> <p>16 Q. (BY MR. FREEMAN) Do you know if the funds</p> <p>17 were being deposited into Windspeed's bank account?</p> <p>18 MS. HARD-WILSON: Objection; form.</p> <p>19 A. I don't know.</p> <p>20 Q. (BY MR. FREEMAN) In January of 2021, did you</p> <p>21 provide a W-9 for ACET Global, LLC, to Groupon?</p> <p>22 A. No.</p> <p>23 Q. Sai, I'm going to go up here just a little</p> <p>24 further, go back to where we were. Sai, I'll show you</p> <p>25 what I'm highlighting here. See if this helps.</p>	<p>1 Q. Have you ever had any discussions with Jane</p> <p>2 about that topic?</p> <p>3 A. All I had a conversation was to help her out</p> <p>4 and fix this issue.</p> <p>5 Q. And did fixing this issue involve sending a</p> <p>6 W-9 to Groupon?</p> <p>7 A. I wasn't -- I'm not sure. I wasn't -- I</p> <p>8 didn't send anything off.</p> <p>9 Q. Sai, if you'll look here, does this appear to</p> <p>10 be -- on page Bates-labeled Windspeed 0415, does this</p> <p>11 appear to be an email from you sent on January 5th of</p> <p>12 2021?</p> <p>13 A. Yes.</p> <p>14 Q. Is that this year, Sai?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Do you remember sending this email?</p> <p>17 A. This does look like an email I would send,</p> <p>18 yes.</p> <p>19 Q. Does this appear to be a true and correct</p> <p>20 copy of that email?</p> <p>21 A. This was an email I had sent, so...</p> <p>22 Q. Okay.</p> <p>23 A. Yes.</p> <p>24 Q. And you state -- you state in here that there</p> <p>25 was transactions that reflect from January to</p>

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<p>1 September, which does not reflect Windspeed Trading 2 but to ACET Global, LLC; is that correct?</p> <p>3 A. I believe so.</p> <p>4 Q. Okay. So was there -- was there income being 5 reported to the wrong entity?</p> <p>6 A. It looks like it.</p> <p>7 Q. Did that mean there was income being reported 8 to ACET Global when it should have been reported to 9 Windspeed?</p> <p>10 MS. HARD-WILSON: Objection; form.</p> <p>11 A. No. No.</p> <p>12 Q. (BY MR. FREEMAN) No?</p> <p>13 A. No.</p> <p>14 Q. What was it then?</p> <p>15 A. It looked like this should have been reported 16 to ACET Global, if I can recall.</p> <p>17 Q. Okay. So was this income that was being 18 reported to Windspeed and Groupon was getting it mixed 19 up with ACET Global?</p> <p>20 A. This should have been reported to ACET 21 Global.</p> <p>22 Q. Okay.</p> <p>23 A. That's it. That's all I can recall.</p> <p>24 Q. And why is that?</p> <p>25 MS. HARD-WILSON: Objection; form.</p>	<p>1 Q. (BY MR. FREEMAN) Did Bill Szeto control those 2 accounts?</p> <p>3 A. No.</p> <p>4 Q. Who controlled those accounts?</p> <p>5 A. I don't know.</p> <p>6 MR. PERRIN: Objection; form.</p> <p>7 Q. (BY MR. FREEMAN) Who established Windspeed's 8 accounts?</p> <p>9 A. When you mean "accounts," what do you mean?</p> <p>10 Q. Its accounts with sales platforms.</p> <p>11 MR. PERRIN: Objection; form.</p> <p>12 A. I'm not sure what you're asking.</p> <p>13 Q. (BY MR. FREEMAN) Okay. How did Windspeed -- 14 how did Windspeed establish a relationship with any of 15 the sales platforms that you worked with?</p> <p>16 MR. PERRIN: Objection; form.</p> <p>17 A. We have a relationship with them or we've 18 acquired with them.</p> <p>19 Q. (BY MR. FREEMAN) Or you've what?</p> <p>20 A. We've acquired with them, so they're new 21 accounts.</p> <p>22 Q. Okay. "Acquired"?</p> <p>23 A. Yeah, acquired.</p> <p>24 Q. Okay. For example, how did the sales 25 platforms know that they were dealing with Windspeed</p>
<p>1 A. Because this is what I was told from Jane.</p> <p>2 Q. (BY MR. FREEMAN) Okay. Did some of the other 3 vendors get ACET Global and Windspeed mixed up?</p> <p>4 MR. PERRIN: Objection; form.</p> <p>5 A. I don't know.</p> <p>6 Q. (BY MR. FREEMAN) Did Windspeed take over any 7 of ACET Global's accounts with any vendors?</p> <p>8 MR. PERRIN: Objection; form.</p> <p>9 A. I don't know.</p> <p>10 Q. (BY MR. FREEMAN) Did ACET -- did Windspeed 11 take over any of ACET Global's accounts on any sales 12 platforms?</p> <p>13 MR. PERRIN: Objection; form.</p> <p>14 A. I don't know.</p> <p>15 Q. (BY MR. FREEMAN) Aren't you the sales 16 manager?</p> <p>17 MS. HARD-WILSON: Objection; form.</p> <p>18 MR. PERRIN: Objection; form.</p> <p>19 A. Yes.</p> <p>20 Q. (BY MR. FREEMAN) Who would know the answer to 21 that?</p> <p>22 A. I'm not sure.</p> <p>23 Q. Is there anyone other than you?</p> <p>24 A. Bill Szeto.</p> <p>25 MS. HARD-WILSON: Objection; form.</p>	<p>1 rather than ACET Global?</p> <p>2 MR. PERRIN: Objection; form.</p> <p>3 A. Because they knew that we were Windspeed 4 Trading. We signed a contract with them.</p> <p>5 Q. (BY MR. FREEMAN) Okay. But Windspeed didn't 6 use any of the ACET Global's old accounts?</p> <p>7 A. No.</p> <p>8 Q. Did the IRS also get ACET Global and 9 Windspeed mixed up?</p> <p>10 MR. PERRIN: Objection; form.</p> <p>11 A. From the looks of it, yes.</p> <p>12 Q. (BY MR. FREEMAN) So why did the business 13 change from ACET Global to Windspeed?</p> <p>14 MR. PERRIN: Objection; form.</p> <p>15 MS. HARD-WILSON: Objection; form.</p> <p>16 A. I'm not sure.</p> <p>17 Q. (BY MR. FREEMAN) When it did change over, how 18 did you distinguish the inventory that was ACET 19 Global's inventory?</p> <p>20 A. I didn't. I wasn't able to separate the 21 inventory.</p> <p>22 Q. Like you couldn't tell the difference?</p> <p>23 A. Right, yes.</p> <p>24 Q. Was it pretty much the same kind of inventory 25 for both?</p>

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<p>1 MR. PERRIN: Objection; form.</p> <p>2 A. Right.</p> <p>3 Q. (BY MR. FREEMAN) Okay. Was it like a -- was</p> <p>4 it kept in a different area of the warehouse?</p> <p>5 A. I'm not sure. I just know that it was</p> <p>6 fulfillment, their -- that's their control of where</p> <p>7 they store the merchandise.</p> <p>8 Q. Okay. Do you know if there was ever a</p> <p>9 foreclosure on ACET Global's inventory?</p> <p>10 A. I'm not sure.</p> <p>11 Q. Okay. Do you know if anybody ever came and</p> <p>12 separated off ACET Global's inventory?</p> <p>13 A. I'm not sure.</p> <p>14 Q. When you switched over to Windspeed, did the</p> <p>15 marketing efforts change at all?</p> <p>16 MR. PERRIN: Objection; form.</p> <p>17 A. I was not -- oh, Windspeed doesn't do any</p> <p>18 marketing.</p> <p>19 Q. (BY MR. FREEMAN) Okay. Did ACET Global?</p> <p>20 A. No.</p> <p>21 Q. Okay. Did Windspeed do anything to roll out</p> <p>22 the new name, the new Windspeed name?</p> <p>23 MR. PERRIN: Objection; form.</p> <p>24 A. I'm sorry, can you repeat that again?</p> <p>25 MR. FREEMAN: Yeah, can I get the basis</p>	<p>1 Q. (BY MR. FREEMAN) Sai, what steps did</p> <p>2 Windspeed take to roll out and market its new name,</p> <p>3 the Windspeed name?</p> <p>4 MR. PERRIN: Objection; form.</p> <p>5 A. I don't know.</p> <p>6 Q. (BY MR. FREEMAN) Did it take any steps to</p> <p>7 roll out its logo?</p> <p>8 MR. PERRIN: Objection; form.</p> <p>9 MS. HARD-WILSON: Objection; form.</p> <p>10 MR. FREEMAN: Basis, Ed?</p> <p>11 MR. PERRIN: Same basis: vague;</p> <p>12 ambiguous; and misleading.</p> <p>13 MR. FREEMAN: How is it misleading, Ed?</p> <p>14 MR. PERRIN: I made my objection. It's</p> <p>15 on the record.</p> <p>16 Q. (BY MR. FREEMAN) Sai, did Windspeed do</p> <p>17 anything to roll out its logo?</p> <p>18 MR. PERRIN: Objection to form.</p> <p>19 A. I don't know.</p> <p>20 Q. (BY MR. FREEMAN) Sai, did Windspeed do</p> <p>21 anything to roll out its website?</p> <p>22 MS. HARD-WILSON: Objection; form.</p> <p>23 A. I don't know.</p> <p>24 Q. (BY MR. FREEMAN) Were you asked to do</p> <p>25 anything to facilitate the change to Windspeed?</p>
<p>for that objection, Ed?</p> <p>MR. PERRIN: Vague and ambiguous and</p> <p>misleading.</p> <p>MR. FREEMAN: Okay. That is ridiculous.</p> <p>You are just objecting, objection, objecting, sending</p> <p>signals --</p> <p>MR. PERRIN: No, I'm not, and you're</p> <p>asking the witness --</p> <p>MR. FREEMAN: -- making ambiguous and</p> <p>misleading.</p> <p>THE REPORTER: Hey. Hey. Hey. One at</p> <p>a time.</p> <p>MR. FREEMAN: "Did Windspeed do anything</p> <p>to roll out its new name?"</p> <p>MS. HARD-WILSON: Is that a question?</p> <p>MR. FREEMAN: Well, it was, but now it's</p> <p>a question to Ed, how that's vague and ambiguous and</p> <p>misleading.</p> <p>MR. PERRIN: Your question speaks for</p> <p>itself, Jason.</p> <p>MR. FREEMAN: Clearly, much like the</p> <p>bankruptcy order did.</p> <p>MS. HARD-WILSON: Could you please</p> <p>repeat the question to the deponent?</p> <p>MR. FREEMAN: Yeah, I will.</p>	<p>A. No.</p> <p>Q. Were any of the other employees asked to do</p> <p>anything to facilitate the change to Windspeed?</p> <p>MR. PERRIN: Objection; form.</p> <p>A. I'm not sure.</p> <p>MR. FREEMAN: Basis, Ed?</p> <p>MR. PERRIN: Basis is vague; ambiguous;</p> <p>misstates prior testimony.</p> <p>MR. FREEMAN: How did I state any</p> <p>testimony, Ed?</p> <p>MR. PERRIN: No, I said "misstates prior</p> <p>testimony," because, prior, she said they're just</p> <p>different -- distinct and different entities, and</p> <p>you're talking about facilitating a transition to an</p> <p>entity that is a distinct and separate entity because</p> <p>you're trying to create something that didn't happen.</p> <p>MR. FREEMAN: Okay.</p> <p>Q. (BY MR. FREEMAN) Sai, was there any</p> <p>discussion during the transition about what to do with</p> <p>ACET Global's inventory?</p> <p>MR. PERRIN: Objection; form.</p> <p>A. There was no transition.</p> <p>Q. (BY MR. FREEMAN) What do you mean, "There was</p> <p>no transition"?</p> <p>A. There was two different companies.</p>

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<p>1 Q. Okay. Sai, at Windspeed, did you use any of 2 the ACET Global desks? 3 A. I'm not sure. 4 Q. Did Windspeed use any of the ACET Global 5 desks? 6 A. I'm not sure. 7 MS. HARD-WILSON: Objection; form. 8 Q. (BY MR. FREEMAN) Did Windspeed use any of the 9 ACET Global cabinets? 10 A. I'm not sure. 11 Q. Did Windspeed use any of the ACET Global 12 computers? 13 A. I'm not sure. 14 Q. Did you use the same computer that you had 15 used at ACET Global? 16 A. I'm not sure. 17 Q. Sai, did you get a new computer when you went 18 to Windspeed? 19 A. Yes, I did. 20 Q. As soon as you started? 21 A. No. 22 Q. What did you use as a computer until you got 23 the new computer? 24 A. I used a laptop. 25 Q. Did you use that laptop when you worked at</p>	<p>1 the witness. And stop it, Jason. You're out of line. 2 A. Yes. 3 Q. (BY MR. FREEMAN) Okay. Sai, did you use the 4 same desk when you went to Windspeed that you had used 5 at ACET Global? 6 MS. HARD-WILSON: Objection; form. 7 A. It was the same desk, I believe. 8 Q. (BY MR. FREEMAN) Sai, did you use the same 9 cabinets when you went to Windspeed that you had used 10 when you worked at ACET Global? 11 MS. HARD-WILSON: Objection; form. 12 A. What cabinets are you talking about? 13 Q. (BY MR. FREEMAN) I'll ask you a different 14 one, Sai. 15 Sai, did Windspeed use the same fulfillment 16 desk computer that ACET Global had used? 17 A. I believe so. 18 Q. Sai, did Windspeed also use some of the same 19 monitors, computer monitors, that ACET Global had 20 used? 21 A. I believe so, yes. 22 Q. Sai, did Windspeed also use the same laser 23 printer that ACET Global had used? 24 A. What laser -- just any printer? 25 Q. A laser printer?</p>
<p style="text-align: center;">Page 71</p> <p>1 ACET Global? 2 MS. HARD-WILSON: Objection; form. 3 A. I believe so. 4 Q. (BY MR. FREEMAN) Was that laptop owned by 5 ACET Global? 6 A. I don't know. 7 Q. Did you believe it was the company's laptop? 8 A. I would assume so. 9 Q. Okay. And you continued to use that laptop 10 whenever you went to work for Windspeed? 11 MS. HARD-WILSON: Objection; form. 12 A. I believe so, yes. 13 Q. (BY MR. FREEMAN) Okay. Sai, likewise, did 14 you continue to use the same desk that you had used 15 when you worked at ACET Global? 16 MR. PERRIN: Objection; form. 17 A. I don't know. I don't know whose was -- I 18 don't know whose inventory was ACET Global; the desk, 19 the computer, I wasn't -- I'm not sure. 20 Q. (BY MR. FREEMAN) Okay. Sai, do you 21 understand you're under oath today? 22 A. Yes. 23 Q. And do you understand that it's a crime not 24 to tell the truth under oath? 25 MR. PERRIN: Objection; form; harassing</p>	<p style="text-align: center;">Page 73</p> <p>1 A. I believe so. 2 Q. Sai, did Windspeed also use the same 3 warehouse desk that ACET Global had used? 4 A. I believe so. 5 Q. Did Windspeed also use the same customer 6 service desk that ACET Global had used? 7 A. I think so, yes. 8 Q. Did Windspeed use the same accounting desk 9 that ACET Global had used? 10 A. Yes. 11 Q. Did Windspeed use the same CEO desk that ACET 12 Global had used? 13 A. I believe so. 14 Q. Did Windspeed use the same CEO chair that 15 ACET Global had used? 16 A. I'm not sure. I know Bill likes his own 17 chair. 18 Q. Did Windspeed use the same conference table 19 that ACET Global had used? 20 A. I believe so. 21 Q. Did Windspeed use the same receptionist desk 22 that ACET Global had used? 23 A. I believe so, yes. 24 Q. Did Windspeed use the same chairs for the 25 foyer that ACET Global had used?</p>

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<p>1 A. Yes.</p> <p>2 Q. Did Windspeed use the same refrigerator that</p> <p>3 ACET Global had used?</p> <p>4 A. Yes.</p> <p>5 Q. Did Windspeed also use the same microwave</p> <p>6 that ACET Global had used?</p> <p>7 A. I believe so.</p> <p>8 Q. Did Windspeed also use the same watercooler</p> <p>9 that ACET Global had used?</p> <p>10 A. I believe so.</p> <p>11 Q. Did Windspeed also use the same folding</p> <p>12 machine that ACET Global had used?</p> <p>13 A. Yes.</p> <p>14 Q. Did Windspeed also use the same software that</p> <p>15 ACET Global had used?</p> <p>16 A. Software, as in what?</p> <p>17 Q. Microsoft 365?</p> <p>18 A. I don't think so.</p> <p>19 Q. Did it use the same inventory software?</p> <p>20 A. What inventory software?</p> <p>21 Q. Just any software, if you know.</p> <p>22 A. We did use a software, yeah, for inventory.</p> <p>23 Q. And did Windspeed continue to use the same</p> <p>24 software?</p> <p>25 A. It wasn't the same software. I mean, it was</p>	<p>1 Q. Okay. Did Windspeed use the same supplier</p> <p>2 list that ACET used?</p> <p>3 A. We never had a supplier list.</p> <p>4 Q. Did it -- did Windspeed use the same</p> <p>5 suppliers that ACET Global used?</p> <p>6 A. We never had a supplier list.</p> <p>7 Q. Just putting the lists itself --</p> <p>8 A. Okay, we never had -- we never had the same</p> <p>9 suppliers. I'm not sure what you're asking.</p> <p>10 Q. Okay. Did Windspeed use the same pricing and</p> <p>11 cost information that ACET Global used?</p> <p>12 A. No.</p> <p>13 Q. Did Windspeed use any of the same sales data</p> <p>14 that ACET Global had used?</p> <p>15 MR. PERRIN: Objection; form.</p> <p>16 A. No.</p> <p>17 Q. (BY MR. FREEMAN) Did Windspeed use any of the</p> <p>18 trademarks that ACET Global had used?</p> <p>19 A. No.</p> <p>20 Q. Did Windspeed use any of the logos that ACET</p> <p>21 Global had used?</p> <p>22 A. No.</p> <p>23 Q. Did Windspeed use any of the URLs or domains</p> <p>24 that ACET Global had used?</p> <p>25 A. No.</p>
<p>1 the same software, but it was its own program for</p> <p>2 Windspeed.</p> <p>3 Q. Okay. Was that ShipStation?</p> <p>4 A. Okay. I was thinking about something else.</p> <p>5 ShipStation is not for inventory purposes.</p> <p>6 Q. Okay. What is ShipStation?</p> <p>7 A. ShipStation is what we use to create -- to</p> <p>8 create labels for the orders that are synced into that</p> <p>9 software.</p> <p>10 Q. Okay. Did ACET Global use ShipStation?</p> <p>11 A. We did use ShipStation, yes.</p> <p>12 Q. Did Windspeed also use ShipStation?</p> <p>13 A. Windspeed used ShipStation.</p> <p>14 Q. Have you ever worked anywhere else that used</p> <p>15 ShipStation?</p> <p>16 A. No.</p> <p>17 Q. Did Windspeed use the same client list that</p> <p>18 ACET Global used?</p> <p>19 A. What do you mean "client list"? Like</p> <p>20 customers?</p> <p>21 Q. Customer list, yes, ma'am.</p> <p>22 A. No, we didn't have a customer list.</p> <p>23 Q. ACET Global didn't have one?</p> <p>24 A. I've never had to deal with a customer list</p> <p>25 at ACET Global.</p>	<p>1 Q. For example, did Windspeed use the URL</p> <p>2 Koolulu.com?</p> <p>3 A. No.</p> <p>4 Q. Did Windspeed use the URL Luluway.com?</p> <p>5 A. No.</p> <p>6 Q. How long have you -- how long after you left</p> <p>7 ACET Global did you continue to use your ACET email</p> <p>8 address?</p> <p>9 MS. HARD-WILSON: Objection; form.</p> <p>10 A. I didn't use the ACET Global email address.</p> <p>11 Q. (BY MR. FREEMAN) Okay. Do you know what</p> <p>12 happened to all of your old emails?</p> <p>13 A. No.</p> <p>14 Q. Did you delete them?</p> <p>15 A. Sorry? There's some music.</p> <p>16 Do I delete my emails?</p> <p>17 Q. Yes, ma'am.</p> <p>18 A. If I don't need to -- if I don't need that</p> <p>19 email, yes, I would delete them.</p> <p>20 Q. Okay. Do you know if you deleted all of your</p> <p>21 old emails from your ACET Global email address?</p> <p>22 A. I didn't.</p> <p>23 (Exhibit 2 marked/introduced.)</p> <p>24 Q. (BY MR. FREEMAN) Sai, do you see what's on</p> <p>25 your screen marked as Exhibit 2?</p>

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<p>1 A. Yes.</p> <p>2 Q. And what is this? Do you recognize it?</p> <p>3 A. Yes. This is a purchase order that Zulily</p> <p>4 sets up.</p> <p>5 Q. Okay. And Zulily is one of the sales</p> <p>6 platforms?</p> <p>7 A. Right.</p> <p>8 Q. Okay. Who's the vendor name on this purchase</p> <p>9 order?</p> <p>10 A. It says -- I'm sorry, it's kind of like --</p> <p>11 Q. Sure. Hard to see?</p> <p>12 A. Yeah. I don't know -- "ACET Venture</p> <p>13 Partners."</p> <p>14 Q. Okay. Who is ACET Venture Partners?</p> <p>15 A. I'm not really familiar with ACET Venture</p> <p>16 Partners.</p> <p>17 Q. Okay. Whose email is listed here?</p> <p>18 A. That is my email.</p> <p>19 Q. Okay. And what date was this shipped?</p> <p>20 A. It looks like it was shipped -- it says:</p> <p>21 "ALL SHIPPED 2.6.19."</p> <p>22 Q. Okay. Was that after you were working for</p> <p>23 Windspeed?</p> <p>24 A. Yes. This was when we worked as Windspeed.</p> <p>25 Q. Is there a reason that your email address is</p>	<p>1 Q. What do you do with that copy?</p> <p>2 A. I just save it for reference.</p> <p>3 Q. Okay. Do you ever look over these?</p> <p>4 A. I don't look -- I don't look at these unless</p> <p>5 there's an issue with the order.</p> <p>6 Q. Okay.</p> <p>7 A. That is why I save them.</p> <p>8 (Exhibit 3 marked/introduced.)</p> <p>9 Q. (BY MR. FREEMAN) Do you recognize Exhibit 3</p> <p>10 on your screen?</p> <p>11 A. Yes.</p> <p>12 Q. Have you ever seen this document or a</p> <p>13 document like this?</p> <p>14 A. It looks like a DHL invoice.</p> <p>15 Q. Okay. And what are those for?</p> <p>16 A. I'm guessing this is to pay for shipping.</p> <p>17 Q. Okay. Do you recognize the name on the</p> <p>18 account?</p> <p>19 A. Yes.</p> <p>20 Q. And that's Windspeed Trading?</p> <p>21 A. Yes.</p> <p>22 Q. Do you recognize this address?</p> <p>23 A. Yes.</p> <p>24 Q. And is that Windspeed's address?</p> <p>25 A. No.</p>
<p style="text-align: center;">Page 79</p> <p>1 saiv@acetglobal.com?</p> <p>2 A. It must have not been updated.</p> <p>3 Q. How was it not updated?</p> <p>4 A. Sorry. It wasn't corrected.</p> <p>5 Q. Okay. Why wasn't it corrected?</p> <p>6 A. Because either the marketplaces needed time</p> <p>7 to make the changes -- needed to make the correct</p> <p>8 changes.</p> <p>9 Q. Okay. What did they need to change from?</p> <p>10 A. They needed -- well, that's not a valid email</p> <p>11 address anymore.</p> <p>12 Q. What if they had needed to get ahold of you</p> <p>13 about something?</p> <p>14 A. Well, I guess they're not going to be able to</p> <p>15 reach out to me.</p> <p>16 Q. Okay. And does this say "Sai's Copy"? [As</p> <p>17 read]</p> <p>18 A. Right. Yes.</p> <p>19 Q. Okay. Was this a copy for you?</p> <p>20 A. Yes.</p> <p>21 Q. And why were you given a copy of this?</p> <p>22 A. This was given a copy because Dana likes to</p> <p>23 scan a copy for me --</p> <p>24 Q. Okay.</p> <p>25 A. -- to see what has been shipped.</p>	<p style="text-align: center;">Page 81</p> <p>1 Q. Whose address is that?</p> <p>2 A. That looks -- that looks like the ACET Global</p> <p>3 address.</p> <p>4 Q. Okay. Do you know why ACET Global's address</p> <p>5 would be on Windspeed's DHL account?</p> <p>6 A. I'm not sure.</p> <p>7 Q. And what date is reflected on this invoice?</p> <p>8 A. December 9, 2018.</p> <p>9 Q. Okay. Was that after you were working for</p> <p>10 Windspeed?</p> <p>11 A. Yes.</p> <p>12 (Exhibit 4 marked/introduced.)</p> <p>13 Q. (BY MR. FREEMAN) And Sai, I'm putting up</p> <p>14 what's marked as Exhibit 4 on your screen. Can you</p> <p>15 see this?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And do you recognize this document?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And what is this?</p> <p>20 A. This is the shipping cost to different zones.</p> <p>21 Q. Okay. And what date is reflected here?</p> <p>22 A. February 19, 2019.</p> <p>23 Q. Okay. And what company's account does this</p> <p>24 appear to be?</p> <p>25 A. Windspeed Trading, LLC.</p>

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<p>1 Q. Okay. And what is the address that's 2 reflected for Windspeed Trading? 3 A. The 1501 10th Street, Plano, Texas. 4 Q. Is that ACET Global's address? 5 A. Right. Yes. 6 Q. Why was ACET Global's address reflected on 7 this DHL account? 8 A. I'm not sure. 9 Q. Okay. But do you recognize this invoice, and 10 does it appear to be a true and correct copy of 11 invoices from DHL? 12 A. This Exhibit 4, you're saying that's an 13 invoice? 14 Q. Yes, ma'am -- or -- 15 A. That's not an invoice. 16 Q. What do you believe it to be? 17 A. This is a shipping reference. This is how 18 much it costs to ship to different zones. 19 Q. Does DHL send this to the company? 20 A. Yes. 21 Q. Okay. Sai, Dana Tomerlin, when did you first 22 meet her? 23 A. I met her the first time I was employed at 24 ACET Global. She was already working there. 25 Q. Okay. What was her role?</p>	<p>1 the day, to ship the products, she prints out this 2 manifest. 3 Q. Okay. But you don't deal with these? 4 A. No. 5 Q. Sai, do you see what's marked as Exhibit 10? 6 (Exhibit 10 marked/introduced.) 7 A. Yes. 8 Q. (BY MR. FREEMAN) Do you recognize this? 9 A. This looks like a restaurant agreement. 10 Q. Have you ever seen this before, or do you 11 know what it is? 12 A. I know that it's an agreement that was sent 13 to us. 14 Q. Okay. Who does this appear to be between? 15 MR. PERRIN: Objection; form. 16 A. Looks like they used Koolulu.com. 17 Q. (BY MR. FREEMAN) Okay. And who is the 18 merchant that's listed on this transaction? 19 A. Jane Lin. 20 Q. Okay. 21 A. Windspeed Trading. 22 Q. By Windspeed Trading, LLC? 23 A. Yes. 24 Q. Okay. And you said earlier that Windspeed 25 did not use Koolulu.com?</p>
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<p>1 A. She was the fulfillment manager. 2 Q. Okay. And is she currently an employee of 3 Windspeed? 4 A. Yes. 5 Q. When did you first meet Jane Lin? 6 A. I don't remember the month I met her. 7 Q. Okay. Was she a -- was it while she was an 8 employee at ACET Global? 9 A. I believe so, yes. 10 Q. Okay. And what is her role or was her role? 11 A. She's an accountant. 12 Q. Okay. She was ACET's accountant? 13 A. Yes. 14 Q. And did she go to work for Windspeed? 15 A. She is an employee at Windspeed. 16 Q. Okay. And is she Windspeed's accountant? 17 A. Yes. 18 (Exhibit 9 marked/introduced.) 19 Q. (BY MR. FREEMAN) Sai, do you see what's on 20 your screen marked as Exhibit 9? 21 A. Yes. 22 Q. Okay. Do you recognize this document? 23 A. I've never seen this type of document, but I 24 know that she ships, like, an end-of-day -- once she 25 ships her -- when it's the final day -- at the end of</p>	<p>1 A. Right. 2 Q. Does this change your recollection of that? 3 MS. HARD-WILSON: Objection; form. 4 A. It looks like the restaurant didn't make 5 the -- the changes to this agreement. They still use 6 Koolulu. 7 Q. (BY MR. FREEMAN) Okay. So Koolulu was ACET 8 Global's? 9 A. Yes. 10 Q. Okay. And you think maybe Restaurant.com 11 just started dealing with Windspeed and failed to 12 change the name from Koolulu? 13 MR. PERRIN: Objection; form. 14 A. Right. 15 Q. (BY MR. FREEMAN) Is that correct? 16 A. Yeah. 17 Q. Okay. Why would -- do you know why 18 Restaurant.com would have believed that Windspeed had 19 some connection to Koolulu.com? 20 MR. PERRIN: Objection; form. 21 MS. HARD-WILSON: Objection; form. 22 A. I'm not sure. 23 Q. (BY MR. FREEMAN) I asked you about a company 24 called Super G earlier. Did you know that -- what did 25 you believe Super G to be, Super G Capital?</p>

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<p>1 A. Oh, sorry. I just remembered that question 2 too. I was thinking of the bank, Texas Capital. 3 Q. Oh, okay. 4 A. Sorry. I don't know anything about Super G. 5 Q. Okay. And you didn't know anything about a 6 gentleman named Steven Bellah? 7 A. No. 8 Q. Or Marc Cole? 9 A. No. 10 Q. Was there ever a time that you were told 11 there was a foreclosure on ACET Global's assets? 12 MR. PERRIN: Objection; form. 13 A. No. 14 Q. (BY MR. FREEMAN) Was there ever a time that 15 you were told Windspeed had acquired ACET Global's 16 assets? 17 MR. PERRIN: Objection; form. 18 A. No. 19 Q. (BY MR. FREEMAN) Was there ever a time that 20 you were told that Windspeed had acquired assets from 21 Super G Capital? 22 A. No. 23 MS. HARD-WILSON: Objection; form. 24 Q. (BY MR. FREEMAN) Was that a "no," Sai? 25 A. Yeah, "no."</p>	<p>1 "EXHIBIT 3"? 2 A. No. 3 Q. So you've never seen this document before? 4 A. I've never seen it. 5 Q. Sai, there are some codes reflected on 6 this -- on "Exhibit 1" of this document, that come 7 before the name or the description of the inventory. 8 Do you know what those are? 9 A. Those are called SKUs. 10 Q. Okay. Do those SKUs look familiar at all? 11 A. I recognize some of them. 12 Q. Where do you recognize them from? 13 A. From the products that we -- what we used to 14 sell. 15 Q. Okay. Who used to sell those? 16 A. ACET Global. 17 Q. ACET Global. 18 Did Windspeed sell any of these? 19 A. I don't recall. 20 Q. That's fine. 21 Do you know who assigns these SKUs? 22 A. No. 23 Q. Sai, could you tell me about ACET 24 Global's -- about the websites that it owned or was 25 associated with?</p>
<p>1 Q. Do you know whether ACET Global had a 2 liability to Super G Capital? 3 A. I don't know that information. 4 Q. Did Bill Szeto ever mention anything about a 5 foreclosure sale? 6 A. No. 7 MS. HARD-WILSON: Objection; form. 8 (Exhibit 12 marked/introduced.) 9 Q. (BY MR. FREEMAN) Sai, I'm putting on your 10 screen what's marked as Exhibit 12. Can you see that? 11 A. Yes. 12 Q. Sai, have you ever seen this document before? 13 A. No. 14 Q. And I'm going to scroll through it just to 15 give you a chance. Are you familiar with the law firm 16 Hallett & Perrin? 17 A. No. 18 Q. Sai, this document, which is reflected on 19 Bates-labeled page DandTPartnersLLC000510, do you 20 recognize this inventory document? 21 A. No. 22 Q. Just one more document here. Do you 23 recognize this listing of equipment? 24 A. No. 25 Q. Do you recognize what's stated here on</p>	<p>1 A. They worked with Luluway.com, and they worked 2 with Koolulu.com. 3 Q. Okay. Is that all that you know of? 4 A. Yes. 5 Q. What was your role, with respect to the 6 websites? 7 A. I was just told to add products. 8 Q. Okay. Were they used for marketing? 9 A. I'm not sure. I was just told to add the 10 products onto the website. 11 Q. Okay. Do you know how much traffic came onto 12 the website? 13 A. No. 14 Q. Can you tell me about Windspeed's website? 15 A. Our website was also to use -- for customer 16 service. 17 Q. Okay. 18 A. And it was also to -- our way of cataloging. 19 Q. What do you mean by "cataloging"? 20 A. Just adding the description and the images. 21 Q. Of the products? 22 A. Of the product, yes. 23 Q. Okay. What is Windspeed's website? 24 A. It's windspeedtradingllc.com. 25 Q. Okay. Do you know if that's active</p>

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<p>1 currently?</p> <p>2 A. No.</p> <p>3 Q. You don't know if it is?</p> <p>4 A. It's not active.</p> <p>5 Q. Why is it not active?</p> <p>6 A. I was told to disable it.</p> <p>7 Q. Who told you to disable it?</p> <p>8 A. Bill.</p> <p>9 Q. Why did Bill want you to disable it?</p> <p>10 A. He just said to disable it. We're no longer using it.</p> <p>12 Q. When did he tell you to disable it?</p> <p>13 A. Probably a few weeks back.</p> <p>14 Q. A couple of weeks ago?</p> <p>15 A. Yeah.</p> <p>16 Q. Did he want you to keep all of the data on there?</p> <p>18 A. He did want me to keep the data; so, yes, it's all still there.</p> <p>20 Q. Where is all the data?</p> <p>21 A. It's on BigCommerce.</p> <p>22 Q. BigCommerce?</p> <p>23 A. Yeah.</p> <p>24 Q. Okay. Did he -- did he tell you to keep the account with BigCommerce or stop paying it?</p>	<p>1 A. Because I was able to disable it.</p> <p>2 Q. Okay. Was this the first you'd heard about taking down the website?</p> <p>4 A. You mean as in, like, my first time taking down a website in general?</p> <p>6 Q. Yes.</p> <p>7 A. Yes.</p> <p>8 Q. Or -- and I mean specifically the first time that Bill had talked about taking the website down.</p> <p>10 A. Yes. It was the first time.</p> <p>11 Q. Do you know what prompted him to take the website down?</p> <p>13 A. No.</p> <p>14 Q. Is Bill very hands-on over the website?</p> <p>15 A. No.</p> <p>16 Q. Would he generally know if anything had happened to the website?</p> <p>18 A. As in what we were doing to the website?</p> <p>19 Q. Yeah.</p> <p>20 A. I mean, if we are communicating it with him, he should know the information.</p> <p>22 Q. Okay. And what is the current status of the website?</p> <p>24 A. It's disabled.</p> <p>25 Q. Okay. Does Windspeed have another website?</p>
<p>1 A. He just said to disable it. So that means you're not paying for it anymore.</p> <p>3 Q. So he stopped paying it?</p> <p>4 A. Yes.</p> <p>5 Q. Do you know how much it cost to pay for it?</p> <p>6 A. No.</p> <p>7 Q. Did he have you take off the payment for it?</p> <p>8 A. No.</p> <p>9 Q. Did he say that he was?</p> <p>10 A. Did he say what?</p> <p>11 Q. That he was going to stop paying for it.</p> <p>12 A. I mean, when you -- when you disable a website, you're not paying for it anymore.</p> <p>14 Q. Okay. Did he download a copy of the website anywhere?</p> <p>16 A. You can't download the website.</p> <p>17 Q. What do you do to back it up?</p> <p>18 A. BigCommerce keeps -- whenever you disable the website, BigCommerce allows you to have the back end for a couple of months.</p> <p>21 Q. Okay. So they say you've got it for a couple of months?</p> <p>23 A. Right. So that's why we have the data still.</p> <p>24 Q. Okay. Did he tell anybody else -- why did he come to you about the website?</p>	<p>1 A. No.</p> <p>2 Q. How was Windspeed's website -- when you disabled it, how was it different from ACET's website?</p> <p>4 A. What do you mean?</p> <p>5 Q. I mean, did it look like it? Did it look totally different?</p> <p>7 A. It looked different.</p> <p>8 Q. How was it different?</p> <p>9 A. The design of the website.</p> <p>10 Q. Design was totally different?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Was it always different?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Did you manage the website?</p> <p>15 A. No.</p> <p>16 Q. Did you look at it very often?</p> <p>17 A. If I'm on the website, it was to look at a certain product for cataloging purposes.</p> <p>19 Q. Did you do that in your day-to-day job?</p> <p>20 A. I'm sorry?</p> <p>21 Q. Did you do that in your day-to-day job?</p> <p>22 A. Not really.</p> <p>23 Q. Okay. How often were you on the website?</p> <p>24 A. Not often. Maybe once a month.</p> <p>25 Q. Okay.</p>

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<p>1 A. It's only when I needed to be on the website. 2 Q. Were you involved in purchasing the domain 3 name for the website? 4 A. No. 5 Q. Were you involved in the design of the 6 website? 7 A. No. 8 Q. Did you make any decisions about how the 9 website would look? 10 A. No. 11 (Exhibit 14 marked/introduced.) 12 Q. (BY MR. FREEMAN) Sai, I'm putting what's 13 marked as Exhibit 14 on your screen. Do you see that? 14 A. Yes. 15 Q. Do you recognize what's on Exhibit 14? 16 A. Yes. 17 Q. What is this? 18 A. It's the Koolulu logo. 19 Q. Is this the Koolulu logo that ACET used? 20 A. Yes. 21 Q. Okay. But Windspeed did not use the Koolulu 22 logo? 23 A. No. 24 (Exhibit 15 marked/introduced.) 25 Q. (BY MR. FREEMAN) Sai, I'm putting what's</p>	<p>1 Q. It looks totally different? 2 A. I mean, the design was different. 3 Q. Okay. Are the products totally different? 4 A. The products look like ACET's products. 5 Q. So the products reflected on Exhibit 16, the 6 pictures of the products, are those ACET Global's 7 products? 8 A. It looks like it, yeah. 9 Q. Okay. Do the descriptions that appear with 10 those products pictured on Exhibit 16, do those appear 11 to be the descriptions used by ACET Global? 12 A. It looks like it. 13 Q. Okay. Can you tell me what the third product 14 on here is? 15 A. It's the "Lady Forever Crystal Jewelry." 16 Q. And what is it made with? 17 A. I can't read that. "Austrian Crystal." 18 Q. "Austrian Crystal"? 19 A. Yeah. 20 Q. Can you tell me what the fourth product is? 21 I'll try and zoom in so you can see it a 22 little easier. 23 A. "Moments of Happiness Crystal Necklace 24 With" -- I don't know if that's the same word. 25 "Austrian Crystals." [As read]</p>
<p>marked as Exhibit 15 on your screen. Do you see that? A. Yes. Q. Okay. And is this a snapshot of Windspeed Trading's website? A. Yes. Q. Okay. And does this appear to be from the website www.windspeedtradingllc.com? A. Yes. Q. Okay. Are you familiar with the term "favicon"? A. No. (Exhibit 16 marked/introduced.) Q. (BY MR. FREEMAN) Do you know what the -- Sai, I'm putting up what's marked as Exhibit 16 on the screen. Do you see this? A. Yes. Q. And does this appear to be a snapshot of the Windspeed Trading website? A. Yes. Q. Okay. Does this -- does this look like ACET Global's website looked? A. You mean the design? Q. Yes, ma'am. A. Was it replicate [as spoken] to ACET Global? Or I'm sorry -- yeah. No.</p>	<p>Does that appear to say "Anstrain Crystals"? A. Oh, "Anstrain." Yeah. I can barely read it. Q. What are -- having worked as the sales manager, what are -- what are Anstrain crystals? A. I don't know. Q. You think that's an error? A. Looks like an error. Q. Okay. Should it maybe say "Austrian Crystals"? A. I guess. Q. Okay. Going down to the second page of this Exhibit 16. What is the item on the left, at the top of the page? A. "Tear Of Fairy Bracelet With Swarovski Elements." Q. Okay. Did you design Windspeed's jewelry page? A. No. Q. And did you have any involvement in how it would be laid out? A. No. (Exhibit 17 marked/introduced.) Q. (BY MR. FREEMAN) Sai, I'm putting up a copy of what's marked Exhibit 17. Do you see this</p>

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<p>1 document?</p> <p>2 A. Yes.</p> <p>3 Q. And what is this document?</p> <p>4 A. This looks like the jewelry.</p> <p>5 Q. Okay. The same jewelry you just -- we just</p> <p>6 looked at in Exhibit 16?</p> <p>7 A. Yes.</p> <p>8 Q. Sai, could you tell me what email address --</p> <p>9 domain name is listed?</p> <p>10 A. Koolulu.com.</p> <p>11 Q. Okay. Sai, could you look at the third</p> <p>12 document listed on this Koolulu.com website --</p> <p>13 A. Yes.</p> <p>14 Q. -- in Exhibit 17?</p> <p>15 A. Yes.</p> <p>16 Q. What is that item?</p> <p>17 A. It's the "Lady Forever Crystal Jewelry."</p> <p>18 Q. Okay. And what is it made with?</p> <p>19 A. "Austrian Crystal."</p> <p>20 Q. Okay. Can you look at the fourth item on the</p> <p>21 Koolulu.com website reflected on Exhibit 17? What is</p> <p>22 this item?</p> <p>23 A. "Moments of Happiness Crystal Necklace."</p> <p>24 Q. Okay. And is it made with something?</p> <p>25 A. With "Anstrain Crystals."</p>	<p>1 Q. Okay. And if you look here back on Exhibit</p> <p>2 16, look at the top, does this appear to be a snapshot</p> <p>3 of the windspeedtradingllc.com website from December</p> <p>4 12, 2018?</p> <p>5 A. Looks like it, yes.</p> <p>6 Q. Does this, in fact, look the way that the</p> <p>7 Windspeed Trading website looked in 2018?</p> <p>8 A. I don't remember it, but if you took a</p> <p>9 snapshot, then, yes, that's what the website would</p> <p>10 look like.</p> <p>11 Q. Does the ACET Global website from August of</p> <p>12 2018 have the same layout as the Windspeed Trading</p> <p>13 website from December of 2018?</p> <p>14 A. Are you saying if the ACET Global's layout is</p> <p>15 the same as Windspeed?</p> <p>16 Q. Yes, ma'am.</p> <p>17 A. It looked -- the layout was different.</p> <p>18 Q. It was different?</p> <p>19 A. Yeah.</p> <p>20 Q. Were they the same products?</p> <p>21 A. Yes. Based on that, looks like the same</p> <p>22 products.</p> <p>23 Q. Do they appear to be the same product</p> <p>24 descriptions?</p> <p>25 A. Yes.</p>
<p>1 Q. Is that "Anstrain Crystals" again?</p> <p>2 A. Yeah.</p> <p>3 Q. Does this website appear to reflect the same</p> <p>4 exact typo that appeared on Windspeed's website?</p> <p>5 A. Yes.</p> <p>6 Q. Does it, in fact, appear to look a whole lot</p> <p>7 like Windspeed's website?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Switch back to Exhibit 16 so that you</p> <p>10 can see that.</p> <p>11 Moving back to Exhibit 17 again, I'll go down</p> <p>12 to the second page. Can you tell me what the first</p> <p>13 item reflected on the left is on Koolulu.com's</p> <p>14 website?</p> <p>15 A. "Tear Of Fairy Bracelet."</p> <p>16 Q. Okay. Looking at the date here, does this</p> <p>17 appear to be a snapshot of Koolulu's website as of</p> <p>18 August 25, 2018?</p> <p>19 A. Yes.</p> <p>20 Q. And does this, in fact, appear to look like</p> <p>21 Koolulu's website looked back in August of 2018?</p> <p>22 A. I would assume so.</p> <p>23 Q. Okay. Do you know so?</p> <p>24 A. I didn't really -- I can't recall back then</p> <p>25 what the website looked like in August 25, 2018.</p>	<p>1 Q. Same number of products?</p> <p>2 A. Yes.</p> <p>3 Q. The same pictures?</p> <p>4 A. Yes.</p> <p>5 Q. The same typographical errors?</p> <p>6 A. Yes.</p> <p>7 Q. And do both appear to lay out four items on</p> <p>8 the top row?</p> <p>9 A. Yes.</p> <p>10 Q. And four items on the second row?</p> <p>11 A. Yes.</p> <p>12 Q. And then do they appear to lay out two items</p> <p>13 on the third row?</p> <p>14 A. On the third row? Yes.</p> <p>15 Q. Yes, ma'am.</p> <p>16 And is there anything else laid out in the</p> <p>17 website.</p> <p>18 A. What do you mean? What else?</p> <p>19 Q. Is there anything else laid out in the</p> <p>20 website than the three rows?</p> <p>21 A. That's pretty much -- what you see is the</p> <p>22 products laid out, just like that.</p> <p>23 Q. And both of them have that same layout?</p> <p>24 A. Yes.</p> <p>25 MR. FREEMAN: Folks, I can take a</p>

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<p>1 five-minute break. I'm not very far from being to a 2 stopping point. 3 (Break.) 4 Q. (BY MR. FREEMAN) Sai, did Windspeed sell 5 anything through Koolulu.com? 6 A. No. 7 Q. Did it market any products through 8 Koolulu.com? 9 A. No. 10 Q. Did Windspeed sell any products through 11 Luluway.com? 12 A. No. 13 Q. Did it market any products through 14 Luluway.com? 15 A. No. 16 Q. Does Windspeed have any DBAs? Do you know 17 what that means? 18 A. "Doing business as." 19 Q. Yes, ma'am. 20 A. Does Windspeed have any DBAs? 21 Q. Yeah. Does it have any other names that it 22 does business under? 23 A. No. 24 Q. Nothing but Windspeed? 25 A. Yes.</p>	<p>1 Q. Has he asked you to suspend any activity? 2 A. No. 3 Q. Has he asked you to suspend any license? 4 A. No. 5 Q. Are you aware of him asking anyone else to do 6 any of those things? 7 A. No. 8 Q. Going back to your termination. Sai, were 9 all the other employees terminated on the same day? 10 A. I'm not sure if we all were, but I would 11 assume we would be. 12 Q. Did everyone get a call from Bill or just 13 you? 14 A. It was an email. 15 Q. It was an email? 16 A. Yes. 17 Q. I thought your testimony earlier was that it 18 was a phone call? 19 A. No. It was a termination letter, an email. 20 Q. Via email? 21 A. Yes. 22 Q. Did everyone receive a similar email? 23 A. I'm not sure if it was similar. 24 Q. Okay. Was everyone unemployed for two weeks? 25 A. I would assume so.</p>
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<p>1 Q. What did Mr. Szeto tell you to expect for 2 this deposition? 3 A. He -- what do you mean, what he expected? 4 Q. What did he tell you to expect from this 5 deposition with me? 6 A. He just -- that you were just going to ask me 7 questions, just like a deposition. 8 Q. Okay. Is that all he said? 9 A. Yes. 10 Q. Okay. Did he tell you I'd be interested in 11 any particular issues? 12 A. No. 13 Q. Did he tell you I'd be interested in when 14 Windspeed was formed? 15 A. No. 16 Q. Did he tell you you should ever say you can't 17 remember an answer? 18 A. No. 19 Q. You testified earlier that Bill Szeto had 20 instructed you to terminate the company's website. 21 Has Mr. Szeto asked you to terminate anything else? 22 A. No. 23 Q. Has he asked you to delete anything? 24 A. No.</p>	<p>1 Q. And you were unemployed for two weeks after 2 receiving that email? 3 A. Yes. 4 Q. Were the rest of the ACET employees 5 unemployed after receiving that email? 6 A. Everyone was terminated after that email. 7 Q. Okay. And did you talk to others after they 8 were terminated? 9 A. No. 10 Q. You didn't talk to anyone after they were 11 terminated? 12 A. No. 13 MS. HARD-WILSON: Objection; form. 14 Q. (BY MR. FREEMAN) But you talked to others 15 after you were terminated? 16 A. I didn't really have any conversation after I 17 was terminated. 18 Q. Okay. So did you get the email and just go 19 home? 20 A. After I got the email, I just accepted that I 21 was terminated. 22 Q. And then what did you do? 23 A. I don't remember. 24 Q. Do you remember where you were when you 25 received that email?</p>

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<p>1 A. I don't remember. 2 Q. Okay. Do you remember what the email looked 3 like? 4 And, Sai, I'm putting on your screen what's 5 marked as Exhibit 26. 6 (Exhibit 26 marked/introduced.) 7 Q. (BY MR. FREEMAN) Have you ever seen this 8 email before? 9 A. No. This was an email sent to Jane. 10 Q. Did you receive an email that looked like 11 this? 12 A. I can't remember what was stated, but it 13 should look like this. 14 Q. Okay. Did you receive an email the same day 15 that Jane did? 16 A. I don't remember. 17 Q. Okay. Did the email that you received tell 18 you that you were terminated effective as of an 19 earlier date? 20 A. No. 21 Q. And if you look at this email -- 22 MR. FREEMAN: Brenda, I see the confused 23 face. 24 Q. (BY MR. FREEMAN) But it's sent on October 9, 25 2018, and the email states that "This is to inform you</p>	<p>1 Q. Can you speak out loud for me for the court 2 reporter? 3 A. Yes. 4 Q. Thank you. 5 Before just now, have you ever spoken to me 6 before? 7 A. No. 8 Q. Have you ever spoken to Jennifer Poe or 9 anyone else, to your knowledge, with my office, at any 10 time before right now? 11 A. No. 12 Q. You said you didn't know Tony Ludlow or David 13 Hook, but have you spoken with them about your 14 deposition before today? 15 A. No. 16 Q. You said you also knew Matt Denegre, but did 17 you speak to him about your deposition today? 18 A. No. 19 Q. You said you don't know who the Baymark 20 entities are, but did you speak to anybody that is 21 with any Baymark entity, to your knowledge, about your 22 deposition today? 23 MR. FREEMAN: Objection; form. 24 Q. (BY MR. PERRIN) Excuse me. I couldn't hear 25 your answer.</p>
<p>1 that your employment with ACET Global is terminated 2 effective September 28, 2018." 3 Did you get an email that said something 4 similar? 5 A. I don't remember what was stated, but I 6 remember there was a termination letter sent. 7 MR. FREEMAN: Sai, that's all the 8 questions I have for you. I appreciate you taking 9 your -- time out of your day to sit for these. 10 You may have some other questions from 11 the others. I doubt it, but you may. 12 I appreciate you sitting for this. 13 THE WITNESS: Thank you. 14 MR. FREEMAN: I'll pass the witness. 15 MS. HARD-WILSON: We have no questions 16 at this time. We'll reserve. 17 E X A M I N A T I O N 18 BY MR. PERRIN: 19 Q. Sai, I'll have a couple of questions, if I 20 may, please. 21 A. Okay. 22 Q. Sai, my name is Ed Perrin, and I represent 23 the defendants in this action, except for Windspeed. 24 All right? 25 A. (Nods head.)</p>	<p>1 A. No. 2 Q. (BY MR. PERRIN) Have you had any 3 communication of any kind with me or anyone, to your 4 knowledge, in my firm before today? 5 A. No. 6 Q. Have you had any communication of any kind 7 with anyone that you understand is with any Baymark 8 entity before today? 9 MR. FREEMAN: Objection; form. 10 A. No. 11 MR. PERRIN: I'll reserve further 12 questions until time of trial. 13 What I think that means, Sai, is that 14 we're done. 15 THE WITNESS: Great. That's good news. 16 MR. FREEMAN: I get to do a redirect, 17 actually, now. 18 F U R T H E R E X A M I N A T I O N 19 BY MR. FREEMAN: 20 Q. Sai, have you ever spoken to me before today? 21 A. No. 22 Q. Sai, have you ever spoken to anyone 23 associated with my firm, to your knowledge, before 24 today? 25 A. No.</p>

<p style="text-align: center;">Page 110</p> <p>1 Q. Sai, have I ever emailed you before? 2 A. No. 3 Q. Sai, has anyone with my firm ever emailed you 4 before? 5 A. No. 6 MR. FREEMAN: Pass the witness. 7 MR. PERRIN: Now, I think you're done. 8 THE WITNESS: All right. Good. 9 (Deposition concluded at 5:28 p.m.) 10 THE REPORTER: Can I get your order? 11 MR. PERRIN: Condensed and a regular. 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: center;">Page 112</p> <p>1 I, SAI VATTANA, have read the foregoing 2 deposition and hereby affix my signature that same is 3 true and correct, except as noted on the previous 4 page(s), and that I am signing this before a notary 5 public. 6 _____ 7 SAI VATTANA 8 STATE OF TEXAS * 9 COUNTY OF _____ * 10 Before me, _____, on 11 this day personally appeared SAI VATTANA, known to me, 12 or proved to me under oath or through 13 _____ (description of identity card or 14 other document), to be the person whose name is 15 subscribed to the foregoing instrument and 16 acknowledged to me that they executed the same for the 17 purposes and consideration therein expressed. 18 Given under my hand and seal of office on 19 this, the _____ day of _____, 2021. 20 21 NOTARY PUBLIC IN AND FOR THE 22 STATE OF TEXAS 23 My Commission Expires: _____ 24 25</p>
<p style="text-align: center;">Page 111</p> <p>1 WITNESS CORRECTIONS AND SIGNATURE 2 Please indicate changes on this sheet of paper, 3 giving the change, page number, line number, and 4 reason for the change. Please sign each page of 5 changes.</p> <p>6 PAGE/LINE CORRECTION REASON FOR CHANGE</p> <p>7 _____ 8 _____ 9 _____ 10 _____ 11 _____ 12 _____ 13 _____ 14 _____ 15 _____ 16 _____ 17 _____ 18 _____ 19 _____ 20 _____ 21 _____ 22 _____ 23 _____ 24 _____ 25 SAI VATTANA</p>	<p style="text-align: center;">Page 113</p> <p>1 NO. DC-19-09828 2 D&T PARTNERS, LLC) IN THE DISTRICT COURT OF 3 (successor in interest) 4 to ACET Venture) 5 Partners, LLC,) 6 Plaintiff) 7 VS.) DALLAS COUNTY, TEXAS 8) 9 ACET GLOBAL, LLC;) 10 BAYMARK ACET HOLDCO,) 11 LLC; BAYMARK ACET) 12 DIRECT INVEST, LLC;) 13 BAYMARK MANAGEMENT,) 14 LLC; BAYMARK PARTNERS;) 15 DAVID HOOK; TONY) 16 LUDLOW AND WINDSPEED) 17 TRADING, LLC,) 18) 116TH JUDICIAL DISTRICT 19 Defendants. 20 21 REPORTER'S CERTIFICATION 22 ORAL DEPOSITION OF SAI VATTANA 23 APRIL 5, 2021 24 (TAKEN REMOTELY) 25 I, Denyce M. Sanders, a Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following: That the witness, SAI VATTANA, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness; That the deposition transcript was submitted on _____, 2021, to the witness, or to the attorney for the witness, for examination, signature, and return to Usher Reporting Service, by _____, 2021; That the amount of time used by each party at the deposition is as follows: MR. FREEMAN - 02:30:40</p>

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1 That pursuant to information given to the
2 deposition officer at the time said testimony was
3 taken, the following includes counsel for all parties
4 of record:
FOR PLAINTIFF
Mr. Jason B. Freeman
FOR BAYMARK ACET HOLDCO, LLC; BAYMARK ACET DIRECT
INVEST, LLC; BAYMARK MANAGEMENT, LLC; BAYMARK
PARTNERS; DAVID HOOK; TONY LUDLOW
Mr. Edward P. Perrin, Jr.
FOR WINDSPEED TRADING, LLC
Ms. Brenda A. Hard-Wilson
I further certify that I am neither counsel for,
related to, nor employed by any of the parties or
attorneys in the action in which this proceeding was
taken, and further that I am not financially or
otherwise interested in the outcome of the action.
Further certification requirements pursuant to
Rule 203 of TRCP will be certified to after they have
occurred.
Certified to by me this 8th day of April, 2021.

DENYCE M. SANDERS, CSR NO. 4038
Expiration Date: 04-30-22
NOTARY PUBLIC IN AND FOR THE
STATE OF TEXAS
My Commission Expires: 4-14-21



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1 FURTHER CERTIFICATION UNDER RULE 203 TRCP
2 The original deposition was _____ was not _____
3 returned to the deposition officer on _____
4 2021.
If returned, the attached Corrections and
Signature page contains any changes and the reasons
therefor;
If returned, the original deposition was delivered
to Mr. Jason B. Freeman, Custodial Attorney;
That \$_____ is the deposition officer's charges
to the Attorney for Plaintiff, Mr. Jason B. Freeman,
TBA#24069736, for preparing the original deposition
transcript and any copies of exhibits;
That the deposition was delivered in accordance
with Rule 203.3, and that a copy of this certificate
was served on all parties shown herein and filed with
the Clerk.

Certified to by me this _____ day of _____,
2021.

DENYCE M. SANDERS, CSR NO. 4038
Expiration Date: 04-30-22
NOTARY PUBLIC IN AND FOR THE
STATE OF TEXAS
My Commission Expires: 4-14-21
Registered Professional Reporter
Certified Realtime Reporter
Registered Merit Reporter
Registered Diplomate Reporter
NCRA Realtime Systems Administrator
Certified Court Reporter - Louisiana
Usher Reporting Services
1326 Lochness Drive
Allen, Texas 75013
214.755.1612